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#### 1995 STATE RESPONSE

**DOCUMENTS 25-34** 

# KALAMAZOO RIVER SITE INVESTIGATION

**DOCUMENTS #25 - 34** 

# PCB TESTING COMPLETED AT THE OTSEGO MILL

**DOCUMENT #25** 

# Outfall 000

Date		4,00		Arochlor (pp	b)			Total
Description	1016	1221	1232	1242	1248	1254	1260	(ppb)
Apr. 28, 1981	<10	<10	<10	<10	<10	<10	<10	
Aug. 30, 1977 Process water				<0.001		< 0.001	<0.001	
Apr. 28, 1981	<10	<10	<10	<10	<10	<10	<10	
Jan. 12, 1988								<0.5
Apr. 14, 1988 24-hour composite	<0.05	< 0.05	<0.05	<0.05	< 0.05	<0.05	< 0.05	
May 1, 1990 24-hour composite sampled at lagoon discharge	<0.05	< 0.05	<0.05	<0.05	< 0.05	<005	<0.05	

# Outfall 001

Date		Arochlor (ppb)								
Description	1016	1221	1232	1242	1248	1254	1260	(ppb)		
Apr. 14, 1988 24-hour composite	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05			
March 23, 1993	<4.74	<4.74	<4.74	<4.74	<4.74	<4.74	<4.74			

# Outfall 002

Date				Arochior (pp	b)			Total
Description	1016	1221	1232	1242	1248	1254	1260	(ppb)
May 20, 1974 Grab composite								<0.1
May 13, 1975 24-hour composite				ND		<0.01	<0.01	
Aug. 9, 1976 24-hour composite				<0.0001		<0.0001	<0.0001	
Aug. 30, 1977 24-hour composite				<0.001		<0.001	<0.001	
Sep. 18, 1978 24-hour composite				<0.1		<0.1	<0.1	
Apr. 28, 1981	<10	<10	<10	<10	< 10	<10	<10	
Jan 12, 1988								<0.5
Apr. 14, 1988 24-hour composite	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	

### Outfall 003

Date	Arochior (ppb)							Total
Description	1016	1221	1232	1242	1248	1254	1260	(ppb)
May 20, 1974 Grab composite Water to 003								<0.1
May 13, 1975 24-hour composite Process water to 003				<0.01		<0.01	<0.01	
Sep. 18, 1978 24-hour composite				<0.1		<0.1	<0.1	
Aug. 28, 1990	ND	<3.0	ND	ND	ND	<1.0	<1.0	<3.0
March 23, 1993	<4.65	<4.65	<4.65	<4.65	<4.65	<4.65	<4.65	

# Outfall 004

Date	Arochlor (ppb)							
Description	1016	1221	1232	1242	1248	1254	1260	(ppb)
May 20, 1974 Grab composite								<0.1
May 13, 1975 24-hour composite				0.53		< 0.01	< 0.01	
Aug. 9, 1976 24-hour composite				< 0.0001		< 0.0001	< 0.0001	
Apr. 28, 1991	<10	<10	<10	<10	<10	<10	<10	
Apr. 14, 1988 24-hour composite	< 0.05	< 0.05	<0.05	< 0.05	< 0.05	< 0.05	< 0.05	

# River Intake

Date	Arochlor (ppb)							Total
Description	1016	1221	1232	1242	1248	1254	1260	(ppb)
May 20, 1974 River intake grab								<0.1
sample composite		j						

Miscellaneous PCB Testing

Date			······································	Arochlor (pp	ob)			Total
Description	1016	1221	1232	1242	1248	1254	1260	(ppb)
Jan. 17, 1980 Menasha Groundwater wells 6-7				<0.1				
Jan. 17, 1980 Menasha groundwater well on 106th Street				<0.2				
Nov. 14, 1980 Sodium carbonate				<0.1			<0.1	
Mar. 14, 1982 Ash-lime sludge				<0.2	<0.2	<0.2	<0.2	< 0.2
Mar. 14, 1982 Fly ash composite				<0.2	<0.2	<0.2	<0.2	<0.2
Mar. 14, 1982 Fly ash from single supplier (sample 2382)				<0.2	<0.2	<0.2	<0.2	<0.2
Mar. 14, 1982 Fly ash from single supplier (sample 2182)				<0.2	<0.2	<0.2	<0.2	<0.2
Mar. 14, 1982 Fly ash from single supplier (sample B082)				<0.2	<0.2	<0.2	<0.2	<0.2
Mar. 24, 1983 Liquor pond sludge composite sample								<50
June 13, 1986 Soil Sample								<100
June 13, 1986 Isopar								<100
June 13, 1986 Soil Sample								< 100
June 13, 1986 Soil at barrel storage area								< 100
Jan. 12, 1988 Sludge								< 200
Feb. 12-26, 1992 Composite Secondary Fiber Rejects (Sample 920495-05)								<500
May 5, 1992 Sludge	<1.9	<9.3	<1.9	<1.9	<1.9	<2.6	<2.6	<0.5
June 29, 1992 Wastewater treatment sludge	<1.9	<9.2	<1.9	<1.9	<1.9	<2.6	<2.6	
July 20, 1992 Secondary Fiber Report		<0.5	< 0.1	< 0.1	<0.1	< 0.1	<0.1	<1

# MEN00783

March 23, 1993 Sludge	<10.95	<10,95	<10.95	<10.95	<10.95	<10.95	<10.95	
March 23, 1993 Spent liquor	<45.99	<45,99	<45.99	<45.99	<45.99	<45.99	<45.99	
April 6, 1993 Sludge	<19	<51	<19	<19	<10	<4.6	<19	
April 13, 1993 Sludge	<1.3	<9.4	<1.3	<100	<1.3	<8.8	<8.0	
April 20, 1993 Sludge	<2.2	<1.9	< 2.2	<100	<2.2	<4.3	<15	

BDL = Below Detection Limit

### MEN00784

March 23, 1993 Sludge	<10.95	<10.95	<10.95	<10.95	<10.95	< 10.95	<10.95	
March 23, 1993 Spent liquor	<45.99	<45.99	<45.99	<45.99	<45.99	<45.99	<45.99	
April 6, 1993 Sludge	<19	<51	<19	<19	<10	<4.6	<19	
Aprìl 13, 1993 Sludge	<1.3	<9.4	<1.3	<100	<1.3	<8.8	<8.0	
April 20, 1993 Sludge	<2.2	<1.9	<2.2	<100	<2.2	<4.3	<15	

BDL = Below Detection Limit



#### MENASHA CORPORATION

OTSEGO, MICHIGAN

Sample: Corrugating Medium

Submitted: October 19, 1971

Analysis: PCB Content

#### Results

Analysis by extraction, partition and electron capture gas chromatography shows the polychlorinated biphenyl (PCB) content to be absolutely less than 2.0 ppm and probably less than 0.4 ppm.

W. T. Engelskirchen 12/15/71

WTE/edl

#### PROCEDURE FOR THE DETERMINATION OF PCB's IN PAPERBOARD SAMPLES

Ten grams of paper sample were weighed, shredded or cut into small pieces, and transferred to a 500 ml round-bottomed flask. One-hundred milliliters of 2% alcoholic potassium hydroxide were added and refluxed for 30 minutes. A 40-ml aliquot was taken from the extract and transferred to a 250-ml separatory funnel. The aliquot was shaken vigorously with 20 ml of petroleum ether and 40 ml of water. The aqueous layer was drained into a second separatory funnel containing 40 ml of petroleum ether, was shaken vigorously, and the aqueous layer discarded. The petroleum ether extracts were combined and washed with three 20-ml portions of distilled water. Discarding the water layer, the petroleum ether extract was dried through a column of anhydrous sodium sulfate, concentrated to a suitable volume, and 2- to 5-µl aliquots were injected for gas chromatographic analysis.



19012.000 November 9, 1971

Menasca Corporation Otsego, Michigan 19078

Gentlemen:

The following result was obtained for the sample we received from your company (Purchase Order Number 07033).

Sample Tientification PCE's ppm

Composite Sample of Corrugating Medium <0.50

The analysis was conducted according to the enclosed procedure. You will be billed for one analysis at \$29. However, we have a minimum program price of \$100; therefore, should you in the future forward less than four samples you will be billed the \$100 minimum.

Thank you for the opportunity to be of service. Should you have any questions or comments, or if we can be of further assistance please do not hesitate to call.

Sincerely yours,

S. I. SHAHIED, Ph.D.

Biochemistry Department

Environmental Sciences Laboratory

SIS:2W Encl.

11/15/71

MEMO TO: Joe Cutro

FROM: K. E. Lowe

SUBJECT: PCB Content of Otsego Medium

- 1. Hazelton Laboratories reports the PCB content of Otsego medium to be less than 0.50 ppm. This analysis was made on a composite sample of sheets from May to August, 1971.
- We understand FDA has not established limits for the PCB content of paper (indirect food additives), but is considering establishing a limit of 5 ppm.
- 3. At this time, PCB contamination of Otsego medium is not considered to be a problem. We have attached copies of Hazelton's report so it can be given to any customer desiring such information.
- 4. Nalco Chemical is making another analysis for PCB and WRC is checking the PCB content in the white water effluent.

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19012.000 November 9, 1971

Menasha Corporation Otsego, Michigan 49078

Gentlemen:

The following result was obtained for the sample we received from your company (Purchase Order Number 07033).

	Sample Identification				PCB's
					ppm
Composite	Sample	of	Corrugating	Medium	<0.50

The analysis was conducted according to the enclosed procedure. You will be billed for one analysis at \$29. However, we have a minimum program price of \$100; therefore, should you in the future forward less than four samples you will be billed the \$100 minimum.

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S. I. SHAHIED, Ph.D. Biochemistry Department

Environmental Sciences Laboratory

SIS:aw Encl.

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# MENASHA CORPORATION OTSEGO, MICHIGAN

Sample: Corrugating Medium

Submitted: October 19, 1971

Analysis: PCB Content

#### Results

Analysis by extraction, partition and electron capture gas chromatography shows the polychlorinated biphenyl (PCB) content to be absolutely less than 2.0 ppm and probably less than 0.4 ppm.

W. T. Engelskirchen 12/15/71

WTE/edl

We have collecteding on PCB+ other suitical Joe V Peg V KEL (last) 18 April 1972 MEN00793 Mr. R. W. King Purchasing Manager Menasha Corporation P. O. Box 367 Neenah, Wisconsin 54956 Dear Mr. King: Relative to your letter of 3 April 1972, we are pleased to advise that we do not have any polychlorinated biphenyls in our sodium sulfite. Very truly yours, REICHHOLD CHEMICALS, INC. J. J. Odom Sales Manager - Chemicals Southern Division 41:OLL Mr. R. C. Beveridge CCI **Purchasing Agent** Menasha Corporation Paperboard Division Otsego, Michigan 49078

TO:

JOE CUTRO

TOM WILLISCROFT

SUBJECT:

DATE:

April 26, 1972

FROM:

W. ALLAN SCHENCK

The results of the PCB analysis on three "two week" composites from North Bend and Otsego are enclosed.

While this data is not a sound basis to say PCB's cannot exceed 5ppm for a few hours run; no further analysis on medium are recommended at this time.

WAS: rp

cc: E. C. Manders

M. O. Morris Tom Fitzgerald

H. Sattler

Report to

#### MENASHA CORPORATION Neenah, Wisconsin

(Samples submitted with letter of April 10, 1972 from Dr. Schenck)

#### POLYCHLORINATED BIPHENYL ANALYSIS OF CORRUGATING MEDIUM SAMPLES

		Pol	ychlorinated Biph	enyl, p.p.m.
Institute File No.	Code No.	Total	Interpreted as Aroclor 1242	Interpreted as Aroclor 1254
72-72007	North Bend - Composite 2/21/72 through 2/29/72	1.1	0.6	0.5
72-72008	North Bend - Composite $3/1/72$ through $3/15/72$	1.3	0.8	0.5
72-72009	North Bend - Composite $3/16/72$ through $3/29/72$	0.3	<0.5	0.3
72-72010	Otsego - Composite $2/18/72$ through $2/29/72$	··· ·· ··	<0.5 <sup>a</sup>	<0.1 <sup>a</sup>
72-72011	Otsego - Composite $3/1/72$ through $3/15/72$		<0.5 <sup>a</sup>	<0.1ª
72-72012	Otsego - Composite $3/16/72$ through $3/30/72$		<0.5 <sup>a</sup>	<0.1ª

Basis of report: As received

Method: Gas chromatography using electron-capture detector

<sup>&</sup>lt;sup>a</sup>Detection limit for Aroclor 1242 = 0.5 Detection limit for Aroclor 1254 = 0.1



THE INSTITUTE OF PAPER CHEMISTRY

Appleton. Wisconsin 54911

Phone 414/734-9251

August 29, 1972 File No. 72-73733-72-73734

Dear Mr. Lowe:

We are enclosing our report on the polychlorinated biphenyl analysis of the two samples we received on August 8, 1972.

This work is covered by your Purchase Order No. 09048, dated August 1, 1972.

Very truly yours,

Irwin A. Pearl
Group Coordinator
Division of Natural

Materials and Systems

Mr. K. E. Lowe Technical Manager Menasha Corporation Paperboard Division Otsego, Michigan 49078

IAP/sh Enclosure



THE INSTITUTE OF PAPER CHEMISTRY

Appleton. Wisconsin 54911

Phone 414/734-9251

August 29, 1972

Report to

MENASHA CORPORATION PAPERBOARD DIVISION Otsego, Michigan

(Samples submitted under Purchase Order No. 09048, dated August 1, 1972)

Polychlorinated Biphenyl,

			р.	p.m.
	Institute File No.	Code No.	Interpreted as Aroclor 1242	Interpreted as Aroclor 1254
	72-73733	Menasha 0-1, 6/1/72 to 6/14/72	<0.5	<0.1
/	72-73734	Menasha 0-2, 6/15/72 to 6/30/72	<0.5	<0.1
\	-> Usa	ny Solver	909-	

20 - W.A. Schouck

Basis of report: As received

Method: Gas chromatography using electron-capture detector

ESOURCES.COMMISSION

AY F. SNELL T ERT M. BOUDEMAN

AL T. JOHNSON

RY H. WHITELEY

N L WOLFE MIES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, LANSING, MICHIGAN 48926

A. GENE GAZLAY, Director WATER RESOURCES COMMISSION

4056 Plainfield Avenue, N.-E. Grand Rapids, Michigan 49505 WATER RESOURCES COMM

CHARLES D. HARRIS

JOHN E. VOGT Vice-Chairman.:

STANLEY QUACKENBUSH

JOHN P. WOODFORD

JOHN H. KITCHEL, M.D.

C. WILLIAM COLBURN

CLEAMON E. LAY

September 18, 1974.

Mr. Norman Johnstone, Technical Supervisor Menasha Corporation Otsego, Michigan 49078

Dear Mr. Johnstone:

Enclosed are three copies of the Report of an Industrial Wastewater Survey conducted at Menasha Corporation Paperboard Division on May 20-22, 1974. The report includes the volume of waste flow, and results of chemical analyses performed on the composite of the collected effluent. In addition, grab samples were obtained for certain determinations.

I believe the report is self-explanatory, however, I would like to call your attention to the results in Table 2. The data shown in Table 2 for outfall #003 indicates that Menasha Corporation was in compliance with the initial daily maximum effluent limitations set forth in the company's N.P.D.E.S. Permit during the survey period. The initial daily average loading of BODs during both survey periods, and suspended solids during the first period, exceeded the stated limits for outfall 003. Settleable solids were also present in all outfails sampled while the permit requires that the discharge be essentially free of settleable solids.

There are other items mentioned in the report, specifically on page five under "Comments" which require further discussion. These items may have been addressed in your final plans which are currently under review. Therefore, after you have had a chance to read this report, I suggest we set up a meeting For October 8, 1974 at 1:30 P.M. In your office for a joint review of the report, and if time is available, the final plans Menasha Corporation has submitted to meet the final N.P.D.E.S. limitations. Please indicate by return: letter or phone if this meeting date is convenient for you.

Very truly yours,

WATER RESOURCES COMMISSION

Chester Harvey, Basin Engineer

RP/mc Enclosures

Kari Zoliner

Ouantitative analyses of grab composite samples collected from the outfalls and river intake at Menasha Corporation to determine the concentration of select hydrocarbons present in the samples.

Outfall .	#030134	#030053 (to 003)	#030055 (004)	River
From To	(002) 5-20-74 5-22-74	5-20-74 5-22-74	5-20-74 5-22-74	Intake 5-20-74 5-22-74
· ·	ppb	ppb	ppb	ppb
Polychlorinated Biphenyls	<0.1	<0.1	<0.1	<0.1
Phthalates as DEHP as DBP	4 8	9 10	8 <1	<1 <1

MICHIGAN WAIER RESOURCES COMMISSION BUREAU OF WAIER MANAGEMENT ENVIRONMENTAL PROTECTION BRANCH DEPARTMENT OF NATURAL RESOURCES

Report of an Industrial Hustelater Survey Conducted at MENASHA CORPORATION All Outfalls No. 030019 Allegan County Otsego, Michigan Nay 13-14, 1975



#### Survey Surmary

Wastemater monitoring was performed during one twenty-four hour survey period starting Tuesday, May 13, 1975.

Menasha Corporation discharged a combined total of 6.3 MGD from four outfalls during the survey period. Results of the continually monitored outfalls as noted in Table 1 are:

<u>Outfall</u>	nut 001	002	Cocling	Du3 Process	004
Flow (MGD)	0.380	0.612	4.32	0.918	0.076
\$.05 (mg/1)	< 5	300	< 5	300	8
8005 (15s/day)		1500		2300 :-	5
(1/pm) shilos betuscau2	4	100	29	2420	345
Suspended sol. (lbs/day	) 13	500	1045	19000	220
Settleable solids (mg/)		60	21	1880	150
Phenol (mg/l)	·	0.9		1.0	0.04

Hydrocarbon analyses of the 24-hour grab composite samples collected from one process outfalls resulted in 0.53 ug/l PCB's from the treatment system discharge to 603. Phthalate concentrations were found present in all 3 of the outfalls sampled (Table 3).

Nenasha Corporation exceeded their National Pollutant Discharge Elimination System (NPDES) Permit No. MI0003824, initial daily maximum limitations for phenols at outfalls 002 and process wastewater to 003. B0D5 and suspended solids loadings for outfall 002 and suspended solids loadings for the process wastewater to 003 would exceed the 30-day average limitations. Daily maximum temperature limitations for outfall 004 were also exceeded in two of three grab samples. (Table 4)

The company's May 1975 operating report was similar to the survey findings except for reporting considerably lower suspended and settleable solids plus phenol results for the process to outfall CO3. Lower total phosphorus values are also being reported for the process wastewater to CO3, suspended solids at CO2, and temperature for CO4. The May 1975 report did not contain the cooling discharge to outfall CO3. (Table 4)

Comparison of the company's analyses from a split portion of the survey samples revealed higher BODs and lower suspended and settleable solids for outfalls 002 and 003 than the survey results (Table 5).

Since the last survey conducted at this plant in May 1974, flows have decreased at outfalls CO3 and CO4, and increased at CO2. BOD5 increases are evident at outfall CO2 with decreases from the process to CO3. Suspended and settleable solids are both up at outfalls CO2 and process to CO3. PhenoI increases are apparent for CO2 and process wastewater to CO3 also (Table 6).

#### Survey Comments

Menasha Corporation utilizes permanently installed meirs with flow meters on outfalls 002 and process to 003. A staff constructed box weir was repaired for monitoring outfall 004. No permanent flow measuring devices are being utilized for outfall 001 or the turbine cooling water to 003. Turbine cooling water flows to 003 are determined from pump capacity. Automatic samplers are located at outfalls 002 and the process to 003. Outfalls 002's sampler was inoperative and hence the company was grab compositing samples. Sampling is being conducted in accordance with the permit except for pH readings, which are taken from the composites of outfalls 002 and process to 003. BODs and suspended solids analyses are being conducted by the company according to the permit while total phosphorus and phenol analyses are performed by a commercial laboratory.

Midway through the survey, the company discovered a valve between the aeration lagoon and the final settling ponds had been opened. Thus, a portion of the process wastewater discharged to outfall 003 was not going through the clarifier (See Figure 1).

Several of the BOD and bacteria samples collected during the survey were not analyzed within the six-hour holding time allowed for these parameters. Colorimetric interferences were noted by the laboratory for sulfide analyses.

By-passes previously possible for outfall 002 and the surge pit have been eliminated. A turbine cooling water by-pass was still evident bubbling up in the vicinity of outfall 004.

#### Purpose of Survey

The purpose of the survey was to determine the quality and quantity of wastewater being discharged by Menasha Corporation, a principal discharger, to the Kalamazoo River.





Table 4. Comparison of results obtained during the survey at Menasha Corporation with the facility's NPDES Permit, No. MI 0003824, and monthly operating report for May 1975.

Source	Parameter (U	nit)	NPDES P Average Daily		ations aximum Daily	Monthly May Ave.	Operating	<u>Report</u> 5-13-75	Survey Results 5/13-14/75	_
030138-001	Flow BOD <sub>5</sub> Susp. Sol. pH	(MGD) (mg/l) (mg/l) (SU)	  	6.5 - 9.5	20 20	0.289 3 11 8.2	510 3 20 8.4	0.359 : 3 5 8.4	0.380 <5 4 7.5	
030134-002	Flow BOD5 Susp. Sol. Set. Sol. Phenol pH	(MGD) (1bs/day) (1bs/day) (mg/1) (1bs/day) (mg/1) (SU)	1,048		2,635, 1,935.  0.3	0.484 835 211 /14 0.4 8.0	0.558 1,625 259 60 .71 8.3	0.542 1,625 407 37 0.7 8.0	0.612 1,500 500 60 300 0.9 7.3	
030053 process to 003	Flow BOD5 Susp. Sol. Set. Sol. Phenol Tot. P. pH	(MGD) (1bs/day) (1bs/day) (mg/1) (mg/1) (mg/1) (SU)	4,000 2,785 		0.3 6.0	0.889 ,746 ,714 31 .064 2.26 8.0		1.028 3,314 2,289	0.918 2;300 19,000 1,880 1.0 4.8 7.7	/ -10-
030055 - 004	Flow Susp. Sol. Temp. pH	(MGD) (1bs/day) (SU)	300	6.5 - 9.5	825 90°F)	0.074 338 77 8.9	0.119 2,236 90 9.2	0.068 86 72 9.2	0.076 32 860 - 1080 7.7	

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#### October 15, 1975

#### Report to

MENASHA CORFORATION PAPERBOARD DIVISION Otsego, Michigan

(Samples received on October 9, 1975.)

# POLYCHLORINATED BIFHENYL ANALYSIS OF CORRUGATING MEDIUM SAMPLES FROM OTSEGO, MICRIGAN MILL

#### Polychlorinated Riphamyl,

		5772			
Institute File To.	Code No.	Interpreted as Aronlor 1242	hatempreted on Arcolor 1254		
75~70041	Sample Set No. 1 - August. (Samples taken 6-4-75 through 6-10-75.)	Trace	'Erace <sup>5</sup>		
75-73842	Sample Set No. 2 - September. (Samples taken 9-5-75 through 9-9-75, 9-11-75, and 9-12-75.)	Trace <sup>c</sup>	Traceb		
75-73843	Sample Set No. 3 - October. (Samples taken 10-1-75 through 10-7-73.)	Trace	īrace <sup>5</sup>		

Cleas than 0.5 ppm

Note: Duplicate determinations were made on each sample.

Dasis of report: As received.

Mothod: Gas chromatography using electron-capture detector.

These tests are performed as a confidential service and cannot be quoted without specific permission of The Institute of Paper Chemistry.

bLess than 0.1 ppm



THE INSTITUTE OF PAPER CHEMISTRY
Post Office Box 1039
Appleton, Wisconsin 54911
Phone: 414/734-9251

August 25, 1976 File No. 76-73083-76-73086

Dear Mr. Roys:

We are enclosing our report on the polychlorinated biphenyl content of the three medium samples and the sample of sludge that we received on July 6 and 8, respectively. In accordance with your instructions, duplicate analyses have been performed, and the individual results are being reported.

The above analyses are covered by your Purchase Order No. 02223, dated July 2, 1976.

If there is any way in which we can be of further assistance, please let us know.

Sincerely,

Dwight B. Easty
Research Associate
Division of Natural
Materials & Systems

Mr. Gary E. Roys Process Chemist Menasha Corporation Otsego Paperboard Mill 320 North Farmer Street Otsego, Michigan 49078

BK/mce

Enclosure: Report

cc: Dr. W. Allan Schenck, Otsego Paperboard Mill
Mr. Bruce Buchanan, Otsego Paperboard Mill



THE INSTITUTE OF PAPER CHEMISTRY
Post Office Box 1039

Appleton, Wisconsin 54911 Phone: 414/734-9251

August 25, 1976

Report to

MENASHA CORPORATION PAPERBOARD DIVISION Otsego, Michigan

(Samples received on July 6 and 8, 1976)

#### POLYCHLORINATED BIPHENYL ANALYSIS

Polychlorinated Biphenyl,

		•	P	ppm		
Institute		Interpre Aroclo		1242 Aroclor 12		
File No.	Code No.	<u>Test 1</u>	Test 2	Test 1	Test 2	
76-73083	Medium Sample - Group A	Trace <sup>a</sup>	Trace <sup>a</sup>	Traceb	0.4	
76-73084	Medium Sample - Group B	0.4 <sup>c</sup>	Trace <sup>a</sup>	0.3	0.3	
76-73085	Medium Sample - Group C	0.3	0.3	0.2	0.2	
76~73086	Sludge Sample	d	d	<sup>d</sup>	d	

Basis of report: As received.

Methods: File No. 76-73083/085--Gas chromatography using electron-capture

detector.

File No. 76-73086--Methods for organic pesticides in water and wastewater. Environmental Protection Agency, 1971.

<sup>&</sup>lt;sup>a</sup>Less than 0.2 ppm

bLess than 0.1 ppm

<sup>&</sup>lt;sup>C</sup>The chromatogram was distorted.

<sup>&</sup>lt;sup>d</sup>A large interference peak obscured the chromatogram. Removal of the interference will be attempted. If successful, the result will be reported at a later date.

72 I O I 17 1976 Viole: Qual. Commo

MICHIGAN DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION BUREAU POINT SOURCE STUDIES SECTION

Report of an
Industrial Wastewater Survey
Conducted at
MENASHA CORPORATION
All Outfalls No. 030019
Allegan County
Otsego, Michigan
August 9-10, 1976

#### Survey Summary

Wastewater monitoring was performed during one twenty-four hour survey period starting Monday, August 9, 1976.

The results of this survey did not meet the final limitations in the facility's National Pollutant Discharge Elimination System (NPDES) Permit, No. MI0003824. The plant exceeded its phenol limitations at the process outfall 030134 (002) and the process wastewater prior to mixing with cooling water, outfall 030171. The total phosphorus limitation was also slightly exceeded at outfall 030171. The suspended solid limitation was exceeded at outfall 030055 (004) on the composite sample (Table 1).

A comparison of the results found on this survey to the results reported on the plant's monthly operating report can be seen in Table 4. The survey staff found higher phenol concentrations atoutfalls 030134 (002) and 030171. The survey staff also found higher settleable solids than the company at outfall 030171.

A comparison of the laboratory analytical results obtained by the plant and the Environmental Protection Bureau from the split composite samples can be seen in Table 5. Higher BOD results were found by the Environmental Protection Bureau laboratory while the suspended solids concentrations compared well.

The results found on this survey are generally lower than those found on the May 1975 survey (Table 6).

In the composite samples, a BOD of 140 mg/l was found at the combined process and cooling water outfall 003 and of 80 mg/l on the old ash lime pond outfall 030055 (004) (Table 1). High oil & grease concentrations were found in one of the two samples collected at outfalls 030134 (002) and 030055 (004) (Table 2).

#### Survey Comments

An electrical failure prevented collection of a composite sample with the scoop-type sampler at 030138 (001). The sample was composed of grab samples collected during the survey and was not split with the company for analyses.

Quantitative analyses of the 24-hour composite samples collected from the Menasha Corporation discharges to the Kalamazoo River, to determine the concentration of the wastewater constituents present in the samples, plus the computed bounds per day (lbs/day) of these constituents being discharged. Also noted are the highest and lowest flow rates recorded during the survey period.

Outfalls Survey Period From To	030138 (001) 8-9-76 - 1200 8-10-76 - 1153		030134 (002) 8-9-76 - 1330 8-10-76 - 1325	
Computed flow rate (mgd) * Highest flow rate (mgd) Lowest flow rate (mgd)		0 1140 0 1745		@ 2345 @ 1330
pH (S.U.)		7.8		8.1
	mg/l	lbs/day	mg/l	lbs/day
5-day BOD 20-day BOD COD	< 5 5 16	11 36	180 200 620	570 630 1970
Total solids Suspended solids Dissolved solids	472 < 5 404	1060  910	852 44 815	2700 140 2580
Orthophosphate-P Total phosphorus-P Nitrite & nitrate nitrogen-N Ammonia nitrogen-N Organic nitrogen-N	0.04 0.72 0.21 0.18 0.28	0.09 1.6 0.47 0.40 0.63	0.01 0.70 0.01 0.04 3.2	0.03 2.2 0.03 0.13
Chlorides (Cl) Sulfates (SO4) Phenols	23 44 < 10	52 99 	27 78 1.0	86 250 3.2
			ug/l	
1242 Polychlorinated biphenyl 1254 " " 1260 " "	i s		< 0.0001 < 0.0001 < 0.0001	

<sup>\*</sup> Flow rates used in the computation of lbs/day.

Table 1 (continued)

Outfalls Survey Period From To	8-9-76	71 Process 5 - 1530 76 - 1550	8-9-76	030055 (004) 8-9-76 - 1440 8-10-76 - 1435	
Computed flow rate (mgd) * Highest flow rate (mgd) Lowest flow rate (mgd)		@ 0530 @ 1345	0.04 0.05 @ 0.04 @		
pH (S.U.)	;	8.3	7.	9	
	mg/1	lbs/day	mq/1	lbs/day	
5-day BOD 20-day BOD COD	280  4,300	2,265  34,800	80 93 96	27 31 32	
Total solids Suspended solids Dissolved solids Settleable solids	6,780 300 5,860 140	54,800 2,430 47,400 1,130	732 85 712 	244 28 238	
Orthophosphate-P Total phosphorus-P Nitrite & nitrate nitrogen-A Ammonia nitrogen-N Organic nitrogen-N	0.2 2.1 0.1 0.6 20	1.6 17.0  4.8 160	0.21 0.54 0.20 0.16 1.4	0.07 0.18 0.07 0.05 0.47	
Chlorides (Cl) Sulfates (SO <sub>4</sub> ) Phenols	97  0.89	790  7.2	61 77 0.03	20 26 0.01	
	<u>ug/1</u>		ug/1		
1242 Polychlorinated biphen 1254 " " 1260 " "	yls <0.0001 <0.0001 <0.0001	 	<0.0001 <0.0001 <0.0001		

<sup>\*</sup> Flow rates used in the computation of lbs/day.

# MICHIGAN DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION BUREAU POINT SOURCE STUDIES SECTION

Report of an Industrial Wastewater Survey Conducted at MENASHA CORPORATION All Outfalls No. 030019 Allegan County Otsego, Michigan August 30-31, 1977

#### Survey Survery

Wastewater monitoring was performed during one twenty-four hour survey period starting Tuesday, August 30, 1977.

The results of this survey did not meet the final limitations in the facility's National Pollutant Discharge Elimination System (NPDES) Permit, No. Michael 224. The doily phenol maximum of 0.3 mg/l was exceeded for outfalls 930131 (002) - 2.6 mg/l and 030171 (process) - 3.6 mg/l. A total phosphorus of 2.6 mg/l was found at outfall 030171 (process), which exceeds the daily maximal limit of 2.0 mg/l (Table 3).

The phenol concentrations reported by the plant in the monthly operating report were much lower than the concentrations found during the survey (Table 3).

The composite samples collected during the survey were split with the plant for additions. The Environmental Protection Bureau's Laboratory results agreed, with the results reported by the company except for phenol concentrations. The plant's results were such lover than the Bureau's laboratory results (Table 4).

A commarison of the results of this survey against the results of the October 1976 survey shows that during this survey 1) the flow at outfall 001 was lover; 2) the BCD, solids and phenol concentrations at outfall 002 were higher; 3) the flow and BCD concentrations in the process wastewater was lower, while the flow of concentration was higher; and 4) the flow at outfall 004 was higher, while the BCD and suspended solids concentrations were lower (Table 5).

#### Purpose of Survey

The purpose of the survey was to determine the quality and quantity of wastewater being discharged by the Benasha Corporation, to the Kalamazoo River and to check for compliance with the NPDES Permit No. MICOO3824.

H

#### Plant Processes

Menasha Corporation, Paperboard Division, produces corrugated cardboard medium through the neutral sulfite pulping process. The mill operates 24 hours a day, 7 days per week, employing 240 people. Normal production is 360-370 tons per day.

-2-

The process begins with hardwood chips that are brought to the plant. The chips are digested with a sulfite cooking liquor consisting of sodium sulfite, soda ash and on rare occasions sodium hydroxide for a buffer. The chips are further broken down through refiners. The pulp is conveyed through mechanical presses which removes 60% of the cooking liquor.

The spent liquor is either sent to a 500,000 gallon liquor storage pend or a separate storage tank. Excess liquor is either given away to the county for use as a roadbinder or concentrated in evaporators and incinerated in a fluid bed reactor to form a sodium sulfite salt cake. The salt cake is sold to Kraft mills for use in their process.

After the presses the pulp enters the stock bin and is sent through prinary refiners to the wood chest. At the wood chest the pulp is blended with recycled scrap paper and broke from the paper machines. The stock is further refined before going through the inlet fan pump to the head box and the two Fourdrinier paper machines.

#### Water Supply, Wastewater & Treatment

Menasha Corporation obtains process and a portion of the cooling water fix either wells or the City of Otsego. Powerhouse cooling water is purped from the Kalamazoo River and the plant's domestic supply is obtained from the city. The company uses an acrylonitrite conditioner at the well heads for calcium and iron treatment. An organosulfur biocide is also added to inhibit bacteria growth. The water used in the boilers is further treated.

The plant has five outfalls to the Kalamazoo River (Figure 1). Outfall 030138 (001) discharges cooling water from the primary refiners, air compressors, drive magnetic clutch and #1 machine oil cooler plus reaf drainane. Outfall 040134 (002) discharges the winder, the digester cooling waters and the contaminants seal water off the #1 machine. The wastewater is treated in a small aeration pond before being discharged.

Part of the condenser cooling water from the powerhouse, outfall 030353, combines with the treated process outfall 030171 and is discharged from outfall 003 to the Kalamazoo River. The rest of the cooling water is discharged through an unpermitted outfall behind the dam.

Vater softener backwash, some cooling waters and miscellaneous floor and roof drainage discharges through the old ash-lime pond, outfall 030055 (094) to the river. Fly and bettom ash from the powerhouse goes to the new ash-lime settling ponds and then to the treatment system.

The white water from the savealls is discharged to the treatment system. The treatment system consists of an aeration lagoon, clarifier and settling pends. The effluent from the treatment system, outfall 030171, is mixed with cooling water before being discharged through outfall 003.

#### Survey Procedure

The flows and composite samples were obtained as follows:

Outfall	Flow Measurement .	Sampling
_ 030138 (001)	Corpany installed 11-7/8 inch full- channel weir. Water level recorder.	
030134 (002)	Corpany installed 24" full channel weir. Water level recorder.	Automatic air activated.
030055 (004)	Company installed 60° v-notch weir. Water level recorder.	Automatic air activated.
030171 (Process)	Company installed 24" rectangular weir. Water level recorder.	Automatic scoop.

ire water level recorders at 030138 (001), 030134 (002), 030055 (004) and 030171 (Process) provided a continuous account of the liquid level or head above the crest of each weir or on a head versus time graph for the duration of the survey period. The total volume of wastewater over each weir during the survey period was computed from the graph.

The samplers at G30138 (001), 030134 (002), 030055 (004) and 030171 (Process) obtained samples proportional to the instantaneous flow over each weir at a time interval.

In type of grap samples were collected from 030138 (001), 030134 (002), 03065 (004), 030171 (Process), 030053 (cooling) and combined process and cooling (003) for selected physical and chemical analyses.

The following formula was used to compute the kilograms per day of various wastewater constituents discharged:  $kg/dgy = flow (H^3/d) \times conc. (mg/l) \times 0.001$ .

The composite and grab samples were analyzed by the Environmental Protection ture su tableratories located in Lansing.

All samples were preserved according to Table 6. The results of the physical and cherical analyses are presented in Tables 1 and 2.

30019	
ation - 0	
ha Corpor	
Kenas	

Table   Analyses of composite samples.	ite sample	.85.						
Outfalls Survey Period From To	030138 8-30-7; 8-31-77	030138 (001) 8-30-77 - 1435 8-31-77 - 1435	030134 8-30-77 8-31-77	030134 (902) 8-30-77 - 1330 8-31-77 - 1330	8-30-7 8-31-7	030055 (004) 8-30-77 - 1240 8-31-77 - 1240	8-30-7 8-30-7 8-31-7	030171 (Process 8-30-77 - 1710 8-31-77 - 1710
Computed flow rate* (1:3/day) Hig es: flow rate ("3/day) Lowest flow rate (1:3/day)	150 1050 @	150 1050 @ 1257-8/31/77	1560 1670 1170	0 1435-8/39/77 0 1333-8/31/77	288 288 288	@ 1137-8/31/77 @ 1543-8/30/77	1200 3300 @	1200 3300 @ 0942-8/ 
	1/6m	ka/day	шд/1	kg/day	1/6/1	ka/day	mg/1	kg/da
5-day 500 COD	۰ 14 14	6.2	240 1000	370 1550	59 5	14	120 3700	1340
Suspended salids Dissol.=d soilds Settleable solids	520	78	100	160 1670	069 2 -	9 071	390 6900 330	470 8280 400
Orthopussphate-P Total prospharus-P Nitrite s nitrate nitrogen-N Arronia nitrogen-N Organic nitrogen-N	11111	11111	0.20 1.4 0.02 0.12 5.0	0.3 2.2 0.03 7.8		11111	2.5 0.12 0.54	1 600 %
Phenols	:	:	5.6	4.1	0.02	0,005	3.6	4.3
Total mangares (Mn)	: :	!!	::	; ;	; ;	; ;	23	28
Total cobalt (Co) Total zinc (Zn)	: ;	; ;	::	; ;	; ;	: :	6.5	0.0
Total cyper (Cu)	:	;	;	•	:		0.03	00
Total vinadium (V)	: :	: :	: :	: :	: :	: :	, 0 5 5	4.0
Total milybdenum (Mo)	:	;	:	;	:	;	0.05	0.0
::::::::::::::::::::::::::::::::::::			0.001 100.0 100.0				0.071 0.001	

rultiply ke/day

w riss ured in the containing of Middle cotting Middle multiply 17 /1 is by 0.00 204.

Table 4 Quantitative analyses of grab composite samples collected from the outfalls and river intake at Menasha Corporation to determine the concentration of select hydrocarbons present in the samples.

Outfall	#030134	#030053 (to 003)	#030055 (004)	River
From To	(002) 5-20-74 5-22-74	5-20-74 5-22-74	5-20-74 5-22-74	Intake 5-20-74 5-22-74
	ppb	ppb	pob	daq
Polychlorinated Biphenyls	<0.1	<0.1	<0.1	<0.1
Phthalates as DEHP as DBP	4 8	9 10	8 <1	<1 <1





CARL T. JOHNSON
E. M LAITALA
DEAN PRIDGEON
HILARY F SNELL
HARRY H WHITELEY
JOAN L. WOLFE
CHARLES G YOUNGLOVE

#### WILLIAM G. MILLIKEN. Governor

#### DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

State Office Building 350 Ottawa Avenue, N. W. Grand Rapids, Michigan 49503

December 29, 1978

Mr. Bruce Buchanan Technical Director Menasha Corporation 320 North Farmer Street Otsego, Michigan 49078

Dear Mr. Buchanan:

Enclosed are two copies of the "Report of An Industrial Wastewater Survey" conducted at the Menasha Corporation's Otsego Mill on September 18-19, 1978. The report includes the volume of wastewater discharged, and results of the chemical analyses performed on the composite of the collected effluents. In addition, grab samples were obtained for certain determinations.

The results of this survey indicate Menasha's discharges to the Kalamazoo River met the final effluent limitations contained in their N.P.D.E.S. Permit No. MI 0003824 during the survey period.

The survey analytical results, when compared to the company's monthly operating reports and split composite sample for suspended solids and settle-able solids, were higher than those reported by the company at outfall 030171 (003), (see Tables 3 and 4).

Two grab samples collected from outfall 030171 contained 100 and 120 mg/l of freon extractables oil and grease (Table 2). While this analytical test is not necessarily specific for oils or greases, to what would you attribute these high concentrations?

The unpermitted discharge of condenser cooling water which discharges above the dam will be handled administratively through our review and evaluation of the company's N.P.D.E.S. Permit renewal application. This was discussed at one of our previous meetings.

Your review and comments regarding the elements contained in the survey report should be submitted by January 31, 1979.

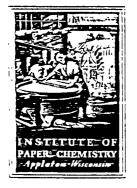




<u>Table 1</u> Analyses of composite samples.

•	•							
Outfalls Survey Period From To	030138 9-18-78 9-19-78	- 1310	9-18-	34 (002) 78 - 1255 78 - 1255	9-18-	71 (003) 78 - 1500 78 - 1500	9-18-7	5 (004) 8 - 1405 8 - 1405
Computed flow rate* (M <sup>3</sup> /day) Highest flow rate (M <sup>3</sup> /day) Lowest flow rate (M <sup>3</sup> /day)	46 - -							-18-78 @ 1420 -19-78 @ 0940
	mg/1	kg/day	mg/1	kg/day	mg/1	kg/day	mg/1	kg/day
5-day BOD COD	3.6 48	1.7 22	20 87	40 170	76 2,700	200 7,300	3.6 65	1.5 27
Suspended solids Dissolved solids Settleable solids	< 1 570 	260	12 510 < 12	24 1,000	330 5,200 100	890 14,000 300	27 810	11 340 
Nitrite & nitrate nitrogen-N Ammonia nitrogen-N Organic nitrogen-N Total phosphorus-P Orthophosphate-P			0.04 0.03 1.1 0.17 0.01	0.08 0.06 2.2 0.34 0.02	0.49 0.89 27 1.9	1 2 73 5		  
Phenols Total cobalt (Co)  Total copper (Cu)  Total zinc (Zn)  Total molybdenum (Mo)  Magnesium (Mg) Potassium (K)			0.32	0.64	0.15 0.08 0.08 0.21 < 0.02 20 42	0.4 0.2 0.2 0.6  50	0.01	0.004     
Manganese (Mn) Vanadium (V)		~ -	  ug/1		0.34 0.04 ug/1	0.9		
PCB 1242 PCB 1254 PCB 1260			< 0.1 < 0.1 < 0.1		< 0.1 < 0.1 < 0.1			

<sup>\*</sup> Flow rates used in the computation of kg/day. To obtain lbs/day multiply kg/day by 0.000264 To obtain lbs/day multiply kg/day by 2.2046



THE INSTITUTE OF PAPER CHEMISTRY

January 17, 1980

Post Office Box 1039 Appleton, Wisconsin 54912

Phone: 414/734-9251

Institute File No. 80-70037

Report to

MEN00814

Dr. W. Allan Schenck Vice-President Technical and Environmental Affairs MENASHA CORPORATION P.O. Box 367 Neenah, WI 54956

Samples received on 1/9/80

POLYCHLORINATED BIPHENYL ANALYSIS

- Part Billion

Polychlorinated Biphenyl,

	<del></del>								
Sample	Interpreted as	Interpreted as	Interpreted as						
Identification	Aroclor 1242	Aroclor 1254	Aroclor 1260						

Menasha Otsego 6-7 Wells, 1-4-80  $< 0.1^{a}$ 

Menasha Otsego Well on 106th  $< 0.2^{b}$ Street, 1-4-80

bThis sample's chromatogram contained a few large peaks, but they were not PCB's.

Basis of Report: As received.

Method: Method supplied by EPA, as noted in Federal Register 38(199), Part II:

28758-60 (Oct. 16, 1973), modified for use on pulp and paper mill

effluents.

Group Leader

Analytical Group

Chemical Sciences Division

These tests are performed as a confidential service and cannot be quoted without specific permission of The Institute of Paper Chemistry.

<sup>&</sup>lt;sup>a</sup>No Aroclor pattern evident.

er desirie:

Menasha Corporation 320 N. Farmer St. Otsego, MI 49078 Attn: Mr. Gary Roys

November 14, 1980

P.O. # 21212

Sample received 10-24-80

HYDRO NO: CUST, ID:	42944 Sodium Carbonate	
Solids, Total, %	99.99	
Sodium Carbonate, mg/kg	945,000 2-5	
Sodium, Na, mg/kg	500,000 🖘 🎋	
Sulfur, S, mg/kg	14,200	
Phosphorus, Total, P, mg/kg	910 (41)	
iron, Fe, mg/kg	280 , 25°,	
Barium, Ba, mg/kg	< 2	
Strontium, Sr, mg/kg	< 22	
Zinc, Zn, mg/kg	30 0 - 2	
Vanadium, V, mg/kg	< 6	
Nickel, Ni, mg/kg	21 (1) (1)	
Aluminum, Al, mg/kg	270	
Lead, Pb, mg/kg	22 (8 5 2 5 )	
Potassium, K, mg/kg	18,000 HSC.	
Magnesium, Mg, mg/kg	1,100 .: '=	
Calcium, Ca, mg/kg	2,300	
Manganese, Mn, mg/kg	340 (35-7-	
Copper, Cu, mg/kg	6.6	
Silicon, Si, mg/kg	< 56	
Titanium, Ti, mg/kg	< 56	
Chromium, Total, Cr, mg/kg	1.1	
Chloride, Cl, mg/kg	1,590 . 5144	
Boron, B, mg/kg	< 100	



### HYDRO RESEARCH SERVICES

Cater Management Division Clow Corporation

Menasha Corporation 320 N. Farmer St. Otsego, MI 49078 Attn: Mr. Gary Roys

November 14, 1980

P.O. # 21212

Sample received 10-24-80

HYDRO NO: CUST. ID:		42944 Sod i um	ı Carbonate
Mercury, Hg, mg/kg		< 0	.1
Cadmium, Cd, mg/kg		1	.0
Arsenic, As, mg/kg		0	.66
Thallium, T1, mg/kg		< 2	
Nitrogen, Kjeldahl, N,	mg/kg	< 20	
Sulfate, SO <sub>4</sub> , mg/kg		42,500	- :
Insoluble matter, %		2	.0
PCB, mg/kg			
reported as Aroclor 124		< 0	.1
125		< 0	- .1

Results reported on a dry weight basis at 104°C.

Linda Carey/Manager Analytical Services

ORDERED BY COEI

## MENASHA CORPORATION

OTSEGO, MICHIGAN 49078 PHONE 616 692-6141

PURCHASE ORD

No. 21212

THIS NUMBER MUSTAP ON ALL PACKAGES, I INVOICES AND CC SPONDENCE.

MEN00817

VENDOR	SHIP TO
Clow Hydro Research Services 408 Auburn Ave.	
Postiac, HI 48058	

ATT. LINGRAL UNGILDIS

RDER		ERIAL REQUIRED DATE	TERMS		CONFIRMING	SALES AND/OR US	SE TAX STA
10/2	24/80	11/15/80	Net 30		ORDER	TAXABLE	EXEMPT
			SHIP VIA			REAL INDUSTRIAL PRO RESALE-LICENS	
TEM	QUANTITY		DESCRIPTION		<del></del>	UNIT PRICE	TOTAL
	1	the following	-				\$383
		1) Sodium Ca 2) Sodium 3) Sulfur 4) Phosphoru 5) Iron 6) Barium 7) Stronium 8) Zinc 9) Vanadium 10) Aluminum 11) Nickel 12) Lead 13) Potassium 14) Magnesium 15) Calcium 16) Hanganese 17) Copper 18) Silicon 19) Titanium 20) Chromium 21) Chloride 22) Boron 23) Total Nit 24) Insoluabl	rogen e matter	25) Merc 26) PCB 27) Suli 23) Cadi 29) Arse	ates		
ITEM D	ATE REC'D. QTY. R	EC'D. DATE REC'D. QTY. REC'D. DA					
				Date		Signed	

## Monsanto

## Environmental Services Report

Mr. Mark Reed MENASHA CORPORATION 320 North Farmer Street P. O. Box 155 Ostego, MI 49078

DATE: 28 April 1981

MRC JOB NO: 215.2910

MRC SAMPLE ID: 1-81-03-05-XX

WRITTEN BY: E. C. Eimutis

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (use the same format) instead of completing these pages SEE INSTRUCTIONS.

PPA LD NUMBER (copy from Hem. Lof Form. I)

MENASHA CORPORATION

1-81-03-05-XX
Form Approved OMB No. 158 R0173

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C)

m 3510-2C (6-80)

PART A. You must provide the results of at least one analysis for every pollutant in this table. It omplete one table for each outfall. See instructions for additional details

	T			2 EFFLUENT	 r			1 3 00	4115	1	TAKE	
4 5011117417	<b> </b>		<del></del>	Z EFF COEN	<del>'</del>		1	tenecity		<del></del>	TAKE Joption	1 <i>01)</i>
1. POLLUTANT	000	T 001	002	004	005	INTAKE	IL NO OF	# CONCEN-	b MASS	CONCENTRATION	E YALUE	ANALYSES
a Biochemical Oxygen Demand (807)												\ <u></u>
b Chemical Daygen Demand (COV)	2520	25	183	34	256	101	1	mg/L				
c. Total Organic Carbon (TUC)	171	<4	42	<4	8	< 4	1	mq/L				
d Total Suspended Solids (TSS)						•			u .			
s Ammonia (as Ni	<5	<5	<5	<5	<5	<5	1	mg/L			· · · · · · · · · · · · · · · · · · ·	
1 Flow	VALUE		VALUI		VALUE					VALUE		
g, Temperature (winter)	VALUE		VALUE		VALUE			°C	· · · · · · · · · · · · · · · · · · ·	VALUE		
h, Temperature leummerj	VALUE		VALUI		VALUE	· · · · · · · · · · · · · · · · · · ·		*0		VALUE		
l. pH	MINIMUM	MUMIKAM	MINIMUM	MAXIMUM	>			STANDAR	DUNITS			

PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2-a for any pollutant, you must provide the results of at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.

I. POLLUT-	2 MA	RK 'K			3	EFFLUENT				4. U	NITS	5. INT	AKE (OPTIONS	t)
CAS NO.	h v	11. 31.	·						THO OF	IN COUCEU.	b. MASS	AVERAG	TEHM E VALUE	NO. OF
(if available)		32.	000	001	002	004	. 005	INTAKE	77.75	THATION	17. MA33		111 11	V589
e Bromide (24959 67 9)														
b Chiorine, Total Residual	<b>-</b>													
c. Color			15000	70	500	150			1	color units				
d, Fecal Coliform			860000		<1				1	per 100 n	ıL			
e, Fluoride (18984 48 8)			<.5	<.5	<.5	<.5			1.	mg/L				
f. Nitreto- Nitrite (as V)			1.3	0.33	0.04	0.3			1	mg/L				4

ITEM V B CON	J <sub>īv</sub>	DERO	OM FRONT				(						(	
1. POLLUT-	L	×			1	CEFLUENT				4 (11)	114	5 INT	ART ( quin-mat)	,
ANT AND CAS NO. (If evaluable)	1		000	001	002	004	005	INTAKE	1 NO OF	] ""^"" [	h MASS	ACINICAL CONCENTRATION	I I MALS	NO 01
g, Nitrogen, Total Organic (as N)			10.5	0.5	1.8	37.3			1	mg/L		1		<u> </u>
h. Olf end Green			240		3	2	1	1	1	mg/L				1
I, Phosphorus (at F), Total (7723-14-0)			8.7		1.6	1.2			1	mg/L			-	
I. Redinectivity	<b>!</b>													<del> </del>
(1) Alpha, Total														
(2) Bete, Yotel														
(3) Redium, Total											<del></del>			<del> </del>
(4) Redium 226, Tatel														<u> </u>
t. Sulfate (es SO <sub>4</sub> ) (14808-79-8)			208	61	66	90			1	mg/L				
l. Sulfide (as 5)			<1	<1	<1	<1			1	mg/L				
m, Sulfite (as SO3) ,14265 48-3)			<2		2	<2			1	mg/L				
n, Surfectionts														
o. Aluminum, Total (7429 90.5)			8150	1980	2230	2060	1970	1990	1	μg/L				
p. Barlum, Total (7440-39-3)			424	119	120	149	96	82	1	րզ/L				
q. Boron, Total (7440 42 8)			2230	229	208	184	200	137	1	μ <b>q/</b> L				
r. Cobelt, Total (7440-48-4)			<100	<100	<100	<100	<100	<100	1	hd\r				
s. Iron, Total (7439-89 6)			2950	930	1300	1900	775	745	1	nd/r				
t. Magnesium, Total (7439 95-4)	·		19100	22200	22800	27200	21000	20300	1	μg/L				
u. Molybdenum, Total (7439 98 7)			269	277	281	304	279	238	1	μg/L				
v. Mangeriess, Total (7439 96 6)			496	98	152	132	71	66	1	lig/L				
w. Tin, Total (7440-31-5)			<1,40	<140	<140	<140	<140	<140	1	μg/L				
x. Titenium, Total (7440 32-6)			78	61	111	83	<50	<50	1	nd/r				

FPA LD NUMBER ICORY from Hem Laf Form II OUTFALL NUMBER

MENASHA CORPORATION

Form Approved OM8 No 158 ROITS

PARTIC - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c 2 in the instructions to determine which of the GC/MS fractions you must test for, Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2 a (secondary industries, non-process wastewater outfalls, and non-required GC/MS fractions), mark "X" in column 2 b for each pollutant you know or have reason to believe is present. Mark "X" in column 2 c for each pollutant you believe to be absent. If you mark either columns 2 a or 2 b for any pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part, please review each circlully. Complete one table (all seven pages) for each outfall See instructions for additional details and requirements

1. POLLUTANT		MARH				3. 0	EFFLUENT				4 U	NITS	5 IN	TAKE forti	onalj
AND CAS NUMBER (II available)	47F77	la es	5.2.	000	001	002		005	INTAKE	I NO OF	4 CONCENTRATION	h MASS		TERM E VALUE	h NO OF
METALS, CYANID		o ror	AL PH	FNOLS		_				-	ļ				<del></del>
1M Antimony, Total (7440 36 0)				<250	<250	<250	<250	<250	<250	1	μg/L				
2M Aremic, Total (7440-38-2)	/			15 _	<5	5	8	<5	<5	1	μg/L				
3M Beryllium, Total, 7440-41 7)	~			3	3	2	3	<2	2	1	ng/L				
4M. Cedmlum, Total (7440-43 9)				<35	<35	<35	<35	<35	<35	1	μg/L				
BM Chromium, Total (7440-47-3)				284.103	21847	216	228	237 49	2 <del>01</del>	1	μg/L				
<b>6M</b> Copper, Total (7550-50-6)				160	95	94	109	84	<70	1	μg/L				
7M, Lead, Total (7439 97-6)				<345	<345	<345	<345	<345	<345	1	րգ/L				
BM, Mercury, Total (7439 97-8)				<1		<1	<1			1	па\Г				
9M. Niekel, Total (7440 02:0)				133	<120	<120	<120	<120	<120	1	ug/L				
10M, Selenium, Total (7782-49 2)				<5	<5	<5	<5	<5	<5	1	μg/L				
11M Bilver, Total (7440-22-4)				<170	<170	<170	<170	<170	<170	1	μg/L				
12M. Theillum, Total (7440-26 0)				<100	<100	<100	<100	<100	<100	1	μg/L				
13M Zinc, Total (7440-86-6)	1			261	61	87	162	60	44	1	μg/L				
14M, Cyanide, Total (57-12-5)	-			60		<4	40			1	μg/L				
15M, Phenels, Total				534		990	54			1	μ <b>g/L</b>				MENOO
DIOXIN											<del></del>				<del></del> 8
A 4 4				DESCRIBE MES	111 TE										~

2.3.7.8 Tetre chloradibenza-P. Digain (1764 01 8)

EPA Form 3510 2C (6-80)

CONTINUED FROM PAGE 3 OF FORM 2 C

IDESCRIBE RESULTS

CONTINUE ON REVERSE PAGE V-J

INTINUED FROM		FRON				<del> </del>				<del></del>		-11 T C		7.0.4.4	
POLLUTANT AND CAS		M A H H				, '	LIFLULNT_	·		Ja 1115 00	4 01	4115	1 LON!	TAKE popular	7
NUMBER	·~			000	7 001	002	1 004	005	INTAKE	\$1.03	THATION	b MA33	AYLIAV	* XVrAK	NO OF
			1 !	000		1			TNIARE			· · · · · · · · · · · · · · · · · · ·	1= 4 71/1-11	1>1 =====	V 5 8 3
CMS FRACTION	- VOI	LATIL	E COM	POUNDS	<del>- </del>			<b> </b>	<b></b>	}	ļ	·	<del> </del>	ļ	<del> </del>
/. Acrolein 07-02-8)				<200		<200	<200			1	hd/F				
/ Acrylonitrile 07 13-11				<100		<100	<100			1	ng/L				
/, Benzene 1 43 2)				<10		<10	<10			1.	hđ/r				
/. Bis (Chloro- rthvl) E ther 42-88-11				<10		<10	<10			1.	_1\g/L_				
/. Bromolorm 5 25 21				<10		<10	<10			1	րց/Լ				
/ Carbon etrachlorida 6-23 5!				<10		<10	<10			1	μg/L				
/ Chlorobenzene 08 90 7)				<10		<10	<10			1	μg/L	1			
/ Chlorodi oingmethene 24 48 1)	_			<10		<10	<10			1	μg/L				
/ Chloroethens 5 00 3)				<10		<10	<10			1	μg/L				
V 2 Chloro hylvinyl Ether 10 75 81				<10		<10	<10			1	µg/L				
V Chloroform 7 66 3)				<10		<10	<10			1	ng/L				
V Dichlora pinomethane 5 27 4)				<10		<10	<10	ì		1	μg/L				!
V Dichloro Norumethane 5 /1 8)	1	1		<10		<10	<10			1	μg/ <b>L</b>				! !
V 1,1 Dichtoro iana (75 34 3)				<10		<10	<10			1	μg/L				
V 1,2 Dichlura ana (107 06 2)				<10		<10	<10			1	μg/L				
/ 1,1 Dichloru ylene (75 35 4)				<10		<10	<10			1	μg/L				
/ 121)ichloro pane (78 87 5)				<10		<10	<10			1	μg/ <b>L</b>				
1, 1,2 Dichloro pylane 2 /5 6)				<10		<10	<10			1	μg/L				
/. Ethylbenzene D 41 4)				<10		<10	<10			1	μg/L				
r Methyl mide (74 83 9)				<10		<10	<10			1	μg/L				
' Methyl bride (74 87 3)				<10		<10	<10			1	μg/L			NTINUE ON	

LIATO NUMBER Gages from Hem Inf. THURST ALL NUMBER OF CONTINUED FROM PAGE V-4 MENASHA CORPORATION Form Approved OMR No. 158 89173 I. POLLUTANI THIUINI 1 114117 AND CAS to my 1, me NUMBER . . . . . . . . . IND DE 1 7441 (if evalable) 000 001 002 005 004 INTAKE 111 Lit wass GCAMS FRACTION - VOLATILE COMPOUNDS to a formerly 22V. Muthylene Chloride (75 09 2) 20 10 Hg/L 23V. 1,1,2,2 Terra chloroethane < 10 <10 (79.34.5) ug/L 24V, Tetrachloro athylene (127 16 4) < 10 < 10 < 10  $\mu q L$ 25V, Toluene (108-86 3) 40 < 10 Tid\Tr 26V, 1,2-Trans Dichloraethylene < 10 (188-60-5) < 10 < 10 lig/L 27V. 1,1,1 Trichloroethene 1 < 10 < 10 < 10 liq/L (71-86-6) 28V. 1, 1,2-Trlchloroethene < 10 1 79-00-51 < 10 < 10 liq/L 29V. Trichloroethylene (79-01-6) < 10 < 10 < 10 1 hd/r 30V. Trichloroliveramethene < 10 pg/L (75-09-4) < 10 < 10 1 31V. Vinyl Chloride (78-01-4) < 10 lig/L < 10 1 < 10 **GCMS FRACTION - ACID COMPOUNDS** 1A. 2-Chlorepheno (96-67-8) < 25 < 25 < 25 μg/L 2A. 2.4 Dichlerephenol (120-83-2) <25 μg/L <25 <25 3A. 2.4 Dimethylphenof (105-67 9) <25 <25 <25 րգ/L 4A. 4,6-Dinitro-O-Crosel (534-52-1) < 250 < 250 < 250  $\mu q/L$ 5A. 2,4-Dinitre-1 phone! (51-29-6) ug/L < 250 < 250 < 250 SA, 2-Nitrophenol 1 (88-76-6) < 25 па∖Г < 25 < 25 7A, 4-Nitr<del>ophon</del>ol < 25 < 25 < 25 1 (100-02-7)  $\mu q/L$ **MEN00823** BA. P.Chlore-M. ١ < 25 < 25 < 25 Cress1 (59-80-7) 1 lig/L SA. Pontachlora < 25 < 25 < 25 1 phonol (87-86-5) µg/L 10A. Phonof 190 (108-95 2) < 25 < 25 1 μα/L 11A. 2.4.6 Telchiprophenel k 25 < 25

186 06 21

ONTINUED FACM	THE			1				·	<del></del>		4 1/1	41.1.1.			· · · · · · · · · · · · · · · · · · ·
1. POLLUTANT	,,,,,	MANN	6 00	<del></del>		-	111 (ULNT _	1	ו				LUNG	TARE (opin)	11 MO OF
MUMBER				000	001	_002	004	005]	TNMAKE	200	# CONCEN TRATION	L MASS	TAR FILLS	F. Y ^ L '   K	STAL
GC/MS FRACTION	BAS			COMPOUNDS					INTAKE						<u> </u>
18. Acenephthene (83 32-9)				<10		<10	<10			1	μg/L				
28 Acenephtylene (208 96-8)				<10		<10	<10			1	րց/ե				
38. Anthracene (120-12-7)				<10		<10	<10			1	lid\r				
48. Benzidine (92 47-8)				<10		<10	<10			1	րց/և				
58. Benzo <i>(a)</i> Anthrecene (56.55.3)				<10		<10	<10			1	и <b>д/Г</b>				
68. Benzo (a) Pyrene (60-32-8)				<10		<10	≤10	-  -		11	_րգ/ <u>୮</u>				
78. 3,4-Benzo- Nuoranthene (206.99-2)				<10	<b></b>	<10	<10			1	_ րց/L_				
88. Benzo (ghi) Perylene (191-24-2)				<25	_	< <u>2</u> 5	<25			_ 1	_րց/ել				
98. Benzo (h) Fluorenthene (207-08-9)				<10		<10	<10			1	ug/L				
108. Bis (2-Chloro- ethaxy) Methens (111-91-1) 118. Bis (2-Chloro-				<10		<10	<10	!	·	1_	րց/ <b>և</b>				
(111-44-4)				<10		<10	_<10			1	μg/L				
128. Bis (2-Chloro- hopropyl) Ether (39638-32-9)				<10		<u>&lt;10</u>	_<10_			1	_1!g/L				
138. Bis (2-Ethyl- hexyl) Phtholato (117-01-7) 148, 4-Bromo-				60		50	40		~. · ·	1	<sup>μ</sup> g/L	<del></del>			
phonyl Phonyl Ether (101-55-3)				<10		<10	_ <10			1	μ <sub>g/L</sub>				
158, Butyl Benzyl Phthelete (85-68-7)				<10	<del>.</del> .	50	<10			1	μ <b>g/L</b>				
168, 2 Chloro- nephthalene (91 58-7) 178, 4 Chloro-				<10		.::<10	<10		., <del></del>	1	μg/L			·	
phonyl Phonyl Ethur (7005-72-3)				_ <u>10</u>		< 10	<10			_ 1	ha/r				
188. Chrysone (218 01-9) 19tj Ditenza (u,h)				<25		<25	<25	-		. 1	μg/L	<b></b> .			<u>S</u>
Anthracene (53 70 3) 208 1 2 Dichloru				.<10		< 10	<10			1	μg/L_				MENOO824
benzene (95 50 1)				<10		< 10	<10			1	μg/L		<u></u> -	<u> </u>	2
21B 1.3 Dichluiu benzene (541 73 1		<u> </u>		< 10		< 10	<10			1	μg/L			MINUL UN	_

ONTINUED FROM PAGE V-6

MENASHA CORPORATION

From Approximation

CONTINUED FROM PAGE V-6			ME	MENASHA CORPORATION				Form Approved OMA No. 158 P0177							
I. POLLUTANI	,	MAHH	, A			1	FFFIHINT	_			4 +11	4) 1 %	5 111	TAPT 1 pm	···ulj
(if available)	L	****		000	001	002	004	005	INTAKE	1 NO 111	A FEMEL H	I, MASS			1, NO 0
CMS FRACTION	- BA	SE/NF	UTRA	L COMPOUNDS	(continued)	,	1		ļ	i _		l			.I
228 1 4 Dichinro benzene (186 46 7			l	<10		<10	<10			1	μg/L			1 	
23B 3,3' Dichloro benzidina (91 94 1)				<10		<10	<10			1	nd/r		<u> </u>		
248 Diethyl Phthelete (84 66 2)				<10		<10	<10			1	ug/L				
268 Dimethyl Phthelete (131 11 3)				<10		<10	<10			_1_	րց/ե_				
268, DIN Butyl Phthelate (84 74 2)				<10		10	<10			1	րց/Լ_				
278 2,4-Dinitro- taluene (121-14-2)				<10		<10	<10			1. 1	_µg/L				
288 2,6 Dinitro- toluene (606 20 2)	_ <b></b>			<10		<10	<10			1	μg/L				
298 DIN Octyl Phthelete (117840)		L		<10		<10_	<10		_	1	hg/L				
108. 1,2-Diphonyl- hydrozino (as Azn- wasene) (122 66 7)				<10		<10	<10	_		1	μg/L	·			
318 Fluorenthene (206 44 0)		<b> </b>		<10		<10	<10			1	ng/L				
328 Fluorene (86 73-7)				<10		<10	<10			1	μg/L				ļ
338 Hexa- chlorobenzene (118 71-1)			<u> </u>	<10		<10	<10			1_11	րգ/Լ				ļ
348 Hexe chlorobutediene (87 68-3)				<10		<10	<10			1_1_	րժ/Г	·			
35B Hexachioro- cyclopentadiene (77 47-4)			<u></u>	<10		<10	< 10			_1	ha/F				
368 Hexachlora- ethane (67-72 1)				<10		<u>_&lt;10</u>	<10			1_1_	μ <b>g/</b> Ι				ļ
37B, Indeno (1,2,3 cd) Pyrene (193 39 5)				< 25		_< 25	_< 2 <u>5</u>	İ		1	μ <b>g/L</b>	., • • • • • •		- · ·	
388. Isophorane (78 59 1)				< 10		< 10	<u>&lt;10</u>			1	μg/L				-
395, Nephthelene (91 20 3)				<10		< 10	_<_10			1	μg/L				_ <u>K</u>
408 Nitrobenzene (98 95 3)				< 10		< 10	_ < 10			1	μg/L				MEN00825
41B, N Nitro- audimethylemine (62 75 9)			_	< 10		< 10	<10	ļ		1	ng/L				082
428, N-Nitrosodi N Propylemine (621 64 7)				< 10		< 10	<10			1	րց/L			NTINUE ON	<u></u>

CONTINUE ON PAGE 172 20 81 1 μg/L <10 <10 <10 15P Endrin Aldehyde (7421 93 4) 1 µg/L <10 <10 \_<10\_\_ 16P Hentechlor 176 44 81 <10 <10 <10 lig/L

J LFF LUENT

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EPA Form 3510-2C (6-80)

**CONTINUED FROM THE FRONT** 

GCMS FRACTION - PESTICIDES

inc. hee Con

GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)

000

< 1.0

< 10

<10

<10

<10

<10

<10

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<10

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001

I. POLLUTANT

AND CAS

NUMBER

(if available)

438 N Nitro

(86-30-6) 44B Phononthrone

(85-01-8) 46B. Pyrane

1.39 00-01 468. 1,2,4 - Trlchiorobenzene

(120 82-1)

1P Aldrin

(309 00 2)

2P G BHC

(319 84 6)

3P. B BHC

(319 85 7)

4P. 7 BHC

SP. B.BHC

(319-86-8)

(87 74-9)

(50-29-3)

(72 65 9)

(72 648)

(60 57 1)

(115-29-7)

(115 29 7)

14P. Endrin

6P. Chlordane

7P. 4.4'-DOT

8P. 4,4' DDE

9P. 4,4" DDD

10P Dieldrin

11P. G-Endosulfan

12P B Endowllan

13P. Endosullan Sulface (1031 07 8)

sodiphenylemine

PAGE V-8

5 INTAKE (optional)

1.1 ----

1 NO OF

AHAL

ANTHANT AVENT

111 1 1.01 0 0

4 UNITS

b MASS

CONCEN

ug/L

ng/L

11g/L

ug/L

Hq/L

ug/L

µg/L

µq/L

ug/L

nd/r

µg/L

ng/L

μq/L

µg/L

μg/L

µg/L

µg/L

d NO OF

AHAL

V 5 8 5

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INTAKE

FFA LD NUMBER ICOPY from Hem Lof Form I OUTLALL NUMBER

CONTINUED FROM PAGE V-8 MENASHA CORPORATION Form Approved OMB No. 158 80177

1. POLLUTANT 2 MARK 'A'		A.	3 4771 HI N1							4 Uf	1115	5 INTAKE (optional)			
AND CAS NUMBER (if ereileble)	# 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	10 es 5		000	001	002	004 .	005	INTAKE	1 NO OF	* COMCEN THATION	U MATS	A LONG		II NO OF AMAL Y'-15
GC/MS FRACTION	_ PI S	TICIDE	Steam	tinuedi											
17F, Hoptochlor Epoxido (1024-67-3)				<10	_	<10	<10	<b>.</b>		1	ng/L				
18P. PCB-1242 (53469 21-9)				<10		<10	<10			1	μg/L				
19P, PCB-1284 (11097-89-1)				<10		<10	<10			1	μg/L				
20P. PCB-1221 (11104-28-2)				<10		<10	<10			1	µg/L				
21F. PC8-1232 (11141-16-5)				<10		<10	<10			1	lig/L				
22F. PC8-1248 (12672-29-6)				<10		<10	<10			1	lid/ľ				
23P. PCB-1260 (11096-82-8)				<10		<10	<10			11	ug/L				
24P. PCB-1016 (12674-11-2)				<10		<10	<10			1	µg/L				
25P. Toxaphone (6001 35-2)				<10		<10	<10			1	hd/F				

EPA Form 3510-2C (6-80)

#### ENVIRONMENTAL RESEARCH GROUP

ANN ARBOR, MICHIGAN 48104 117 N. FIRST (313) 662-3104

8478

SAMPLES RECVD BY : 03-15-82 CLIENT P.O. : 20706 REPORT DATE : 04-14-82 REPORT NO. : 5845

: 20708 : 04-14 : 5845

RESIDUAL SAMPLES WILL BE HELD TWO WEEKS

FOR :

SD = SAMPLE DAMAGED

FR = SEE FIELD REPORT FOR RESULT

BELOW INDICATED LEVEL

MENASHA CORPORATION OTSEGO PAPERBOARD MILL FARMER STREET 49078 OTSEGO, MI

FINAL REPORT ON ERG PROJECT NO.

ATTENTION: GARY ROYS

REFER TECHNICAL QUESTIONS

TO : JOHN WILSON

ND = NONDETECTED, DETECTION LIMIT IN ()

ERG SAMPLE NUMBER DATE COLLECTED CLIENT ID RESULT UNIT PARAMETER & MATRIX LEACHATE OF ASHLIME IRON, TOTAL IN EP-TOX LEACHATE <0.010 mg/L LEACHATE OF ASHLIME CALCIUM, TOTAL IN E. P. TOX LEACHATE LEACHATE OF ASHLIME SODIUM, TOTAL IN E. P. TOX LEACHATE LEACHATE OF ASHLIME COPPER, TOTAL IN EP-TOX LEACHATE <0.005 mg/L LEACHATE OF ASHLIME MAGNESIUM, TOTAL IN E. P. TOX LEACHATE 1.2 mg/L LEACHATE OF ASHLIME
PCB IN E. P. TOX LEACHATE
TOTAL PCB
PCB 1242
ND (0.20) ug/L
PCB 1248
ND (0.20) ug/L
PCB 1254
ND (0.20) ug/L
PCB 1254
ND (0.20) ug/L
PCB 1260
ND (0.20) ug/L
LEACHATE OF ASHLIME
CARBON, TOTAL ORGANIC, IN E. P. TOX LEACHATE
5 mg/L 5 mg/L 072666 COMP FLY ASH ASTM-LEACHATE (LEACH) 3/26/82 PH IN E.P. TOX. LEACHATE 072667 8. 6 S. U. LEACHATE OF FLY ASH SOLIDS, SUSPENDED IN E. P. TOX LEACHATE ND (2) mg/L LEACHATE OF FLY ASH
HARDNESS IN E. P. TOX LEACHATE
TOTAL HARDNESS
CALCIUM HARDNESS 150 mg/L NĂ MAGNESIUM HARDNESS LEACHATE OF FLY ASH SULFATE IN LEACHAFE NA 270 mg/L LEACHATE OF FLY ASH CHLORIDE IN E. P. TOX LEACHATE 31 mg/L LEACHATE OF FLY ASH CHEMICAL DXYGEN DEMAND IN E.P. TOX. 2 mg/L NA = NOT APPLICABLE TO TEST REQUESTED

RESULT SR = SEE ATTACHED REPORT FOR RESULT

AN UNQUANTIFIABLE CONCENTRATION

#### ENVIRONMENTAL RESEARCH GROUP

MEN00829

```
117 N. FIRST . ANN ARBOR, MICHIGAN 48104
(313) 662-3104
```

SAMPLES RECVD BY : 03-15-82 CLIENT P.O. REPORT DATE REPORT NO. 20706 : 20706 : 04-14-82 : 5845

FINAL REPORT ON ERG PROJECT NO. 8478

RESIDUAL SAMPLES WILL BE HELD TWO WEEKS

FOR :

MENASHA CORPORATION OTSEGO PAPERBOARD MILL FARMER STREET 49078 OTSEGO, MI

ATTENTION: GARY ROYS

REFER TECHNICAL QUESTIONS

TO : JOHN WILSON

DATE COLLECTED PARAMETER & MATRIX CLIENT ID

RESULT UNIT

ERG SAMPLE NUMBER

PHOSPHORUS, TOTAL IN EP-TOX LEACHATE, 0.26 mg/L LEACHATE OF FLY ASH NITROGEN, NITRATE IN E. P. TOX LEACHATE

LEACHATE OF FLY ASH LEAD, TOTAL IN EP-TOX LEACHATE

0.026 mg/L

LEACHATE OF FLY ASH ARSENIC, (BY FURNACE AA) TOTAL IN EP-TOX LEACHATE 0.054 mg/L

LEACHATE OF FLY ASH CADMIUM, TOTAL IN EP-TOX LEACHATE

ND (0.003) mg/L

LEACHATE OF FLY ASH CHROMIUM, TOTAL IN EP-TOX LEACHATE ND (0.005) mg/L LEACHATE OF FLY ASH

MERCURY, TOTAL IN E.P. TOX LEACHATE ND(0.0002) mg/L

SELENIUM, (BY FURNACE AA) TOTAL IN E.P. TOX LEACHA 0.025 mg/L

LEACHATE OF FLY ASH IRON, TOTAL IN EP-TOX LEACHATE

<0.010 mg/L

CALCIUM, TOTAL IN E. P. TOX LEACHATE

LEACHATE OF FLY ASH SODIUM, TOTAL IN E. P. TOX LEACHATE

LEACHATE OF FLY ASH
COPPER, TOTAL IN EP-TOX LEACHATE

LEACHATE OF FLY ASH MAGNESIUM, TOTAL IN E. P. TOX LEACHATE

4.2 mg/L

LEACHATE OF FLY ASH
PCB IN E. P. TOX LEACHATE
TOTAL PCB
PCB 1242 ND (0.20) ug/L ND (0.20) ug/L PCB 1248 PCB 1254 PCB 1260 LEACHATE OF FLY ASH ND (0.20) ug/L ND (0.20) ug/L ND (0.20) ug/L

HATE OF FLY ASH CARBON, TOTAL ORGANIC, IN E. P. TOX LEACHATE <1 mg/L

NA = NOT APPLICABLE TO TEST REQUESTED

RT FOR RESULT SR = SEE ATTACHED REPORT FOR RESULT

BUT AT AN UNQUANTIFIABLE CONCENTRATION SD = SAMPLE DAMAGED FR = SEE FIELD REPORT FOR RESULT C = POSITIVE RESULT BUT AT AN UNG

ND = NONDETECTED, DETECTION LIMIT IN ()
PAGE NO. : 3 BELOW INDICATED LEVEL

CONTINUED

#### ENVIRONMENTAL RESEARCH GROUP MENO0830

117 N. FIRST . ANN ARBOR, MICHIGAN 48104 (313) 662-3104

SAMPLES RECVD BY : 03-15-82 CLIENT P. D. : 20706 REPORT DATE : 04-14-82 REPORT NO. : 5845

FINAL REPORT ON ERG PROJECT NO. 8478

RESIDUAL SAMPLES WILL BE HELD TWO WEEKS

FOR:

MENASHA CORPORATION OTSEGO PAPERBOARD MILL FARMER STREET OTSEGO, MI 49078

ATTENTION: GARY RUYS

REI OW INDICATED I EVEL

REFER TECHNICAL QUESTIONS TO: JOHN WILSON

ND = NONDETECTED, DETECTION LIMIT IN ()

77.6	ATTOK. GART ROTO		
CLIENT ID	DATE COLLECTED PARAMETER & MATRIX	RESULT UNIT	ERG SAMPLE NUMBER
	OF 2382 ASH , TOTAL IN EP-TOX LEACHA	TE <0.010 mg/L	
LEACHATE CALC:	OF 2382 ASH IUM, TOTAL IN E. P. TOX	-	
LEACHATE SODI	OF 2382 ASH MM, TOTAL IN E. P. TOX L	<del>-</del>	
LEACHATE COPPI	OF 2382 ASH ER, TOTAL IN EP-TOX LEAC	HATE	
LEACHATE MAGNI	OF 2382 ASH ESIUM, TOTAL IN E. P. T	<pre>&lt;0.005 mg/L  OX LEACHATE</pre>	
TOTAL	OF 2382 ASH E. P. TOX LEACHATE L PCB 1242 1248 1254	5 mg/L ND (0.20) ug/L ND (0.20) ug/L ND (0.20) ug/L	
PCB: LEACHATE	1254 1260 OF 2382 ASH DN, TOTAL ORGANIC, IN E.	ND (0.20) ug/L ND (0.20) ug/L P. TOX LEACHATE 1 mg/L	
2182-IF ASTM-	ASH -LEACHATE (LEACH)	3/26/82	072670
LEACHATE ph II	OF 2182 ASH N E.P. TOX. LEACHATE	9. 6 S. U.	072671
LEACHATE SOL II	OF 2182 ASH DS, SUSPENDED IN E. P. T		
HARDNES TOTAL CALC: MAGNE	OF 2182 ASH SS IN E. P. TOX LEACHATE L HARDNESS IUM HARDNESS ESIUM HARDNESS OF 2182 ASH	-	
SULF	ATE IN LEACHATE OF 2182 ASH	360 mg/L	
CHLOR	RIDE IN E. P. TOX LEACHA OF 2182 ASH	TE 135 mg/L	
CHEM	ICAL OXYGEN DEMAND IN E.	8 mg/L	NMENTAL RESEARCH GROUP INC
- POSITIV	IELD REPORT FOR RESULT /F RESULT BUT AT AN UNGU	SR = SEE ATTACHED ANTIFIABLE CONCENTRA	
DE1 61.1 1	INDICATED LEVEL ND ≈	NONDETECTED, DETECT	11154 ( 107) 1 151 ( 1

117 N. FIRST . ANN ARBOR, MICHIGAN 48104 (313) 662-3104

SAMPLES RECVD BY : 03-15-82 CLIENT P.O. REPORT DATE REPORT NO. 20706 : 04-14-82 : 5845

FINAL REPORT ON ERG PROJECT NO. 8478

RESIDUAL SAMPLES WILL BE HELD TWO WEEKS

FOR :

MENASHA CORPORATION OTSEGO PAPERBOARD MILL FARMER STREET 49078 OTSEGO, MI

ATTENTION: GARY RUYS

REFER TECHNICAL QUESTIONS TO: JOHN WILSON

DATE COLLECTED PARAMETER & MATRIX CLIENT ID

RESULT UNIT

ERG SAMPLE NUMBER

PHOSPHORUS, TOTAL IN EP-TOX LEACHATE 0.25 mg/L

LEACHATE OF 2182 ASH NITROGEN, NITRATE IN E. P. TOX LEACHATE

LEACHATE OF 2182 ASH LEAD, TOTAL IN EP-TOX LEACHATE

<0.010 mg/L

LEACHATE OF 2182 ASH ARSENIC, (BY FURNACE AA) TOTAL IN EP-TOX LEACHATE 0.063 mg/L

LEACHATE OF 2182 ASH CADMIUM, TOTAL IN EP-TOX LEACHATE ND (0.003) mg/L

LEACHATE OF 2182 ASH
CHROMIUM, TOTAL IN EP-TOX LEACHATE ND (0.005) mg/L

LEACHATE OF 2182 ASH MERCURY, TOTAL IN E.P. TOX LEACHATE ND(0.0002) mg/L

LEACHATE OF 2182 ASH SELENIUM, (BY FURNACE AA) TOTAL IN E.P. TOX LEACHA
O. 11 mg/L

LEACHATE OF 2182 ASH IRON, TOTAL IN EP-TOX LEACHATE

0.013 mg/L

LEACHATE OF 2182 ASH CALCIUM, TOTAL IN E. P. TOX LEACHATE

LEACHATE OF 2182 ASH SODIUM, TOTAL IN E. P. TOX LEACHATE 190 mg/L

LEACHATE OF 2182 ASH COPPER, TOTAL IN EP-TOX LEACHATE

LEACHATE OF 2182 ASH MAGNESIUM, TOTAL IN E. P. TOX LEACHATE

LEACHATE OF 2182 ASH
PCB IN E. P. TOX LEACHATE
TOTAL PCB
PCB 1242
PCB 1248
PCB 1254 ND (0.20) ug/L ND (0.20) ug/L ND (0.20) ug/L ND (0.20) ug/L

PCB 1260 ND (0.20) Ug/L LEACHATE OF 2182 ASH CARBON, TOTAL ORGANIC, IN E. P. TOX LEACHATE 1 mg/L

NA = NOT APPLICABLE TO TEST REQUESTED
RESULT SR = SEE ATTACHED REPORT FOR RESULT
T AN UNQUANTIFIABLE CONCENTRATION SD = SAMPLE DAMAGED FR = SEE FIELD REPORT FOR RESULT

ND = NONDETECTED, DETECTION LIMIT IN () BELOW INDICATED LEVEL

ANN ARBOR, MICHIGAN 48104 117 N. FIRST (313) 662-3104

SAMPLES RECVD BY : 03-15-82 CLIENT P. D. : 20706 REPORT DATE : 04-14-82 REPORT NO. : 5845

FINAL REPORT ON ERG PROJECT NO. 8478

RESIDUAL SAMPLES WILL BE HELD TWO WEEKS

FOR :

MENASHA CORPORATION OTSEGO PAPERBOARD MILL FARMER STREET

OTSEGO, MI 49078 REFER TECHNICAL QUESTIONS TO: JOHN WILSON ATTENTION: GARY RUYS DATE COLLECTED PARAMETER & MATRIX ERG SAMPLE CLIENT ID RESULT UNIT NUMBER LEACHATE OF BOB2 ASH IRON, TOTAL IN EP-TOX LEACHATE 0.010 mg/L LEACHATE OF BOB2 ASH CALCIUM, TOTAL IN E. P. TOX LEACHATE LEACHATE OF BO82 ASH SODIUM, TOTAL IN E. P. TOX LEACHATE 230 mg/L LEACHATE OF BO82 ASH COPPER, TOTAL IN EP-TOX LEACHATE 0.006 mg/L LEACHATE OF BOB2 ASH MAGNESIUM, TOTAL IN E. P. TOX LEACHATE 6.6 mg/L LEACHATE OF BO82 ASH
PCB IN E. P. TOX LEACHATE
TOTAL PCB
PCB 1242
PCB 1248
PCB 1254
PCB 1260
ND (0.20) ug/L
1 mg/L 072674 HP2-TAIL ASTM-LEACHATE (LEACH) 3/26/82 LEACHATE OF HP2-TAIL pH IN E.P. TOX. LEACHATE 072675 7. 8 S. U. LEACHATE OF HP2-TAIL SOLIDS, SUSPENDED IN E. P. TOX LEACHATE LEACHATE OF HP2-TAIL SULFATE IN LEACHATE

COMMENTS: HIGHER DETECTION LIMIT DUE TO MATRIX INTERFERENCE.

LEACHATE OF HP2-TAIL CHEMICAL DXYGEN DEMAND IN E.P. TOX.

LEACHATE OF HP2-TAIL NITROGEN, NITRATE IN E. P. TOX LEACHATE 0.03 mg/L

LEACHATE OF HP2-TAIL LEACHATE

0.019 mg/L

SD = SAMPLE DAMAGED NA = NOT APPLICABLE TO TEST REQUESTED FR = SEE FIELD REPORT FOR RESULT SR = SEE ATTACHED REPORT FOR RESULT STATE OF THE SECOND SE

ND = NONDETECTED, DETECTION LIMIT IN () BELOW INDICATED LEVEL

EVALUATION OF EP TOXICITY STUDY OF LIQUOR POND SLUDGE COMPOSITE FOR MENASHA CORPORATION OTSEGO, MICHIGAN

MARCH 24, 1983

By: Western Michigan Environmen Services, Inc. 146 South River Avenue Holland, Michigan 49423 616-396-1209

#### PURPOSE

The purpose of this study is to evaluate the liquor pond sludge composite from Menasha Corporation, Otsego, Michigan, to determine the nature of the leachable constituents for waste disposal. This evaluation will define the possible waste classification in accordance with the criteria set forth in the May 19, 1980, Federal Register, Volume 45, Number 98, 40 CFR Part 261.24, Characteristics of EP Toxicity, Appendix II to that subpart, and the Michigan Department of Natural Resources (DNR), Act No. 64, of the Public Acts of 1979.

#### METHOD AND PARAMETER LIST SECTION

The method selected was the EP Toxicity Study using the Michigan DNR parameters listed in Act No. 64. Also requested for analysis was PCB (polychlorinated biphenyls) and sulfite.

The method and parameter list were provided to Western Michigan Environmental Services, Inc. (ESI) by Dave Schweizer, of Menasha Corporation.

#### DESCRIPTION

The liquor pond sludge composite was a dark brown liquid sludge. The sample was separated into the solid and liquid portions using centrifugation and vacuum filtration through 0.45  $\mu m$  membrane filters. The sample was extremely difficult to separate.

A 64.1 solid sample was finally separated. The liquid was placed in the refrigerator. 124.2 ml of 0.5N Acetic Acid were added to adjust the pH from 9.0 to 5.0. After extraction, the leachate was again separated using centrifugation, then vacuum filtration through 0.45 µm membrane filters.

The original sample contained 27.26% total solids, of which 39.25% were volatile and 60.75% were ash. The sample also contained <0.05 mg/kg PDB and 362 mg/kg sulfite.



#### **HYDRO RESEARCH SERVICES**

Water Management Division Clow Corporation 313/334-4747

10-5-83

Menasha Corporation 320 North Farmer Street Otsego, Mi., 49078 Auth: Mr. Gary Roys

Sample Received: 9-26-83

Hydro Number:

69493

69494

Client I. D.

MSBFR-1

MSAFFR

69493/MSBFP-1, Composite of 6 sheets of paper Roll #s 3572-1, 3571-1, 3570-1, 3569-1, 3568-1, 3567-1

(9191/15AFFR composite of 9 sheets of paper roll#s3599-1, 3598-1, 3597-1, 3596-1, 3595-1, 3594-1, 3593-1, 3592-1, 3591-1

FCPs ng/kg reported as:

Aroelor 1242 (0.1

0.3

Acoclor 1254 =

\_

Accelor 1260 0.2

0.1

Linda Deans

General Laboratory Manager

MEN00837

TO:

Menasha Corporation

Box 155

Otsego, Michigan 49078

Attn: Keith Klinge

DATE:

January 12, 1988

ANALYSIS:

OF VARIOUS SAMPLES

REPORTED BY:

SAMPLING DATE: Received from client December 15, 1987.

RESULTS:

Expressed as noted.

ESI #	SAMPLE I.D.	PARAMETER	CONCENTRATION
8712098-3	Sample #000G-121487	PCB's (µg/l)	<0.5
-4	Sample #002G-121487	PCB's (µg/l)	<0.5
<del>-</del> 5	Sample #Sludge-121487	PCB's (mg/kg dry wt)	<0.2*
<del>-</del> 5	Sample #Paper-121487	PCB's (mg/kg dry wt)	<0.1

<sup>\*</sup>Very small peaks seen that could be PCB 1242, but estimated to be only about 0.1 mg/kg, which is below reported detection limit.

# MICHICAN PERACTIENT OF NATURAL RESOURCES SURFACE WATTR QUALITY DIVISION FIRST SOURCE MONITORING

Report of an
Industrial Wastewater Survey
Conducted at
Henasna Corporation
Faperboard Division
All Outfails No. 030019
MPDES No. MI0003324
Allegan County
Ostego, MI
04/18/88

#### SURVEY SUMMARY

Wastewater monitoring was performed during one twenty-four hour survey period starting Monday, April 18, 1988.

The results of this survey are compared to the final limitations in the facility's National Pollutant Discharge Elimination System (NPDES) Permit, No. MIO30019, in Table 4.

The results of this survey are compared to the results reported by the facility in their April Discharge Monitoring Report (DMR) in Table 4.

A grab sample from outfalls 030171 (000), 030134 (002), and 030055 (004) were split with the facility to compare laboratory analyses. The results are shown in Table 5.

The results of the physical, chemical and bacteriological analyses are presented in Tables 1 & 2. The results of the organic scan analyses are presented in Table 3.

Tyle

RECEIVED

SEP 1 3 1988

SWQD-Plainwell

753FE 0				001
dean 0-Chiprinate/   firsting   Outfall	آر فد د		ilin 086	
iatrix	wa to		78231	
Jampie Time		32::3)	122	
Survey Period from		0, 33 11	بهريني المنتقل	3 30 33 3
to		.9, 99 11u ·	0 17 1	, , , , , ,
Dilution Factor	3 7 1	1		1
		ug/1		ug/l
Aldrin	<	.01	<	.01
*Aroclor 1016	<	.05	<	.05
#Aroclor 1221	<	.05	<	.05
Aroclor 1232	<	.05	<	.05
Aroclor 1242	<	.05	<	.05
*Aroclor 1248	<	.05	<	.05
Aroclor 1254	<	.05	<	.05
Aroclor 1260	<	.05	<	.05
*Aroclor 1262	<	.05	<	.05
*Aroclor 1268	<	.05	<	.05
a-BHC	<	.01	<	.01
b-BHC	<	.01	<	.01
d-BHC	<	.01	<	.01
g-BHC (lindane)	<	.01	<	.01
BP-6 (PBB)	<	.05	<	.05
a-Chlordane	<	.01	<	.01
g-Chlordane	<	.01	<	.01
2-Chloronaphthalene	<	. 2	<	. 2
4,4'-DDD	<	.01	<	.01
4,4'-DDE	<	.01	<	.01
1,4'-DDT	<	.01	<	.01
4,4'-DDT	<	.01	<	.01
1,2-Dichlorobenzene	<	.1	<	.1
1,3-Dichlorobenzene	<	.1	<	.1
1,4-Dichlorobenzene	<	.1	<	.1
Dieldrin	<	.01	<	.01
Endosulfan I	<	.01	<	.01
Endrin	<	.01	<	.01
Heptachlor	<	.01	<	.01
Heptachlor epoxide	<	.01	<	.01
Hexabromobenzene	<	.01	<	.01
Hexachlorobenzene	<	.01	<	.01
Hexachlorobutadiene	<	.01	<	.01
Hexachlorocyclopentadiene	<	.01	<	.01
Hexachloroethane	<	.01	<	.01
Methoxychlor	<	.01	<	.01
Mirex	<i>`</i>	.01	<	.01
Pentachlorobenzene	<	.01	<	.01
Pentachloronitrobenzene	<	.01	<	.01
1,2,3,4-Tetrachorobenzene	<	.01	<	.01
1,2,4,5-Tetrachlorobenzene	<i>`</i>	.01	<	.01
*Toxaphene	``	.05	<	.05
1,2,3-Trichlorobenzene	~	.01	<	.01
1,4,4-Trichlorobenzene	``	.01	<	.01
1,3,5-Trichlorobenzene	<b>`</b>	.01	<u>`</u>	.01
1,0,0 II tonilor obombone	•	1 4 4	•	- <b></b>

<sup>\*</sup> Seldomly encountered, reported semi-quantitatively

_						
	Scan 3-Chlorinated Hyd	rocarbon	s, PCB	s & Organochl	orine.	Pesticidas
	Outfall			(002)		
	Matrix		water	001	water	1004:004
	Sample Type		compos		compos	ite
	Survey Period from		•			88 1045
	to					88 1045
	Dilution Factor		04/13/	1	04/10/	1
	DILUCION PACCOI			•		•
				ug/l		ug/l
	Aldrin			.01		.01
						.05
	*Aroclor 1016			.05		.05
	*Aroclor 1221			.05		
	*Aroclor 1232			.05	< <	.05
	Aroclor 1242			.05		.05
	*Aroclor 1248			.05		.05
	Aroclor 1254			.05		.05
	Aroclor 1260			.05		.05
	*Aroclor 1262			.05		.05
	*Aroclor 1268			.05		.05
	a-BHC			.01		.01
	b-BHC			.01		.01
	d-BHC			.01		.01
	g-BHC (lindane)			.01		.01
	RP-6 (PBB)			.05		.05
,#	Chlordane			.01		.01
	g-Chlordane			.01		.01
	2-Chloronaphthalene		<	. 2	<	. 2
	4,4'-DDD		<	.01	<	.01
	4,4'-DDE		<	.01	<	.01
	1,4'-DDT		<	.01	<	.01
	4,4'-DDT		<	.01	<	.01
	1,2-Dichlorobenzene		<	.1	<	.1
	1,3-Dichlorobenzene		<	.1	<	.1
	1,4-Dichlorobenzene		<	.1	<	.1
	Dieldrin			.01	<	.01
	Endosulfan I			.01	<	.01
	Endrin			.01	<	.01
	Heptachlor			.01	<	.01
	Heptachlor epoxide			.01	< ,	.01
	Hexabromobenzene			.01	<	.01
	Hexachlorobenzene			.01	<	.01
	Hexachlorobutadiene			.01	<	.01
	Hexachlorocyclopentadi	ene	<	.01	<	.01
	Hexachloroethane		<	.01	<	.01
	Methoxychlor		<	.01	<	.01
	Mirex		<	.01.	<	.01
	Pentachlorobenzene		<	.01	<	.01
	Pentachloronitrobenzen	.e	<	.01	<	.01
	1,2,3,4-Tetrachorobenz		<	.01	<	.01
	1,2,4,5-Tetrachloroben			.01	<	.01
•	*Toxaphene			.05	<	.05
	1,2,3-Trichlorobenzene	•		.01	<	.01
	1,4,4-Trichlorobenzene			.01	<	.01
	1,3,5-Trichlorobenzene			.01	<	.01

<sup>\*</sup> Seldomly encountered, reported semi-quantitatively

MEN00841

TO:

Menasha Corporation

320 North Farmer

Otsego, Michigan 49078

Attn: Keith Kling

DATE:

August 24, 1990

ANALYSIS:

OF PAPER SAMPLES

REPORTED BY:

Robert K. Zahray, Laboratory Manager

SAMPLING DATE: Received from client August 8, 1990.

RESULTS:

Expressed as milligrams per kilogram (mg/kg).

#2 Mach #1 Mach #2 Mach #1 Mach 26 lb. 40 lb. 100% Recycle 26 lb. 26 lb. 12/16/89 06/26/90 <u>08/07/90</u> Parameter 04/11/90 PCB-1016 <0.14 <0.14 <0.14 < 0.14 PCB-1221 <0.26 <0.26 <0.26 <0.26 PCB-1232 <0.48 <0.48 <0.48 <0.48 PCB-1242 <0.16 <0.16 <0.16 <0.16 <0.16 PCB-1248 < 0.16 <0.16 <0.16 <0.09 PCB-1254 <0.09 <0.09 <0.09 PCB-1260 < 0.09 <0.09 <0.09 < 0.09 Total PCB's <0.5 <0.5 <0.5 <0.5 ESI #9008083 -1 -2 -3 -4

<sup>\* =</sup> Below detection limit

ENVIRONMI 245 EAST L HOLLANI PHOL

TO:

Menasha Corporation

320 North Farmer

Otsego, Michigan 49078

Attn: Keith Kling Re: EPA Split

DATE:

August 28, 1990

ANALYSIS:

OF WATER SAMPLES

REPORTED BY:

Robert K. Zahray, Laberatory Manager

SAMPLING DATE: Collected by the EPA and received from clien

June 28, 1990.

**RESULTS:** 

Expressed as milligrams per kilogram (mg/kg, dry

weight except where noted in parentheses.

Parameter	Bottom of 307 Site
Silver	<0.5
Aluminum	4110
Arsenic	4.1
Barium	55
Beryllium	<2.5
Calcium	96.0
Cadmium	<0.50
Cobalt	<10
Chromium	5.6
Copper	5.5
Iron	5600
Mercury	0.0170 (mg/kg wet weight)
Potassium	240
Magnesium	920
Manganese	126
Sodium	95
Nickel	7.8
Lead	11
Antimony	42
Selenium	<0.25
Tin	<25
Thallium	3.2
Vanadium	<25
Zinc	36.5
ESI #9006216	<b>-</b> 5

Note: PCB's, EPA Base-Neutrals, EPA Volatiles, and EPA Acid Fraction were run on samples -2 to -5; only PCB's were run on sample -1, see attached tabas.

#### WESTERN MICHIGAN ENVIRONMENTAL SERVICES, INC.

#### TABLE 2 Results for Menasha Corporation Received June 28, 1990. Reported August 28, 1990. Expressed as micrograms per liter $(\mu g/\ell)$ except where noted otherwise. Limit of detection is 2.0 except where noted in parentheses.

Parameter	River Above	P1:307 Down Stream	P2:307 <u>Up Stream</u>	003
PCB-1016	*	MW3,*	11 5 - 1	*
PCB-1221 (3.0)	*	*	*	*
PCB-1232	*	*	*	*
PCB-1242	*	*	*	*
PCB-1248	*	*	*	*
PCB-1254 (1.0)	*	*	*	*
PCB-1260 (1.0)	*	*	*	*
Total PCB's (3.0)	*	*	*	*
ESI #9006216	-1	-2	-3	-4

\* = Below detection limit

Parameter	Bottom of 1 2
PCB-1016 (50)	*
TCB-1221 (60)	*
CB-1232 (50)	*
PCB-1242 (50)	*
PCB-1248 (50)	*
PCB-1254 (10)	*
PCB-1260 (10)	*
Total PCB's (60)	*
ESI #9006216	-5
	•

<sup>\* =</sup> Below Detection Limit

 $<sup>\</sup>hat{1}$  = Expressed as micrograms per kilogram ( $\mu$ g/kg) and the limit of detection is as noted in parentheses.

# Table A Contract Laboratory Program Target Compound List Pesticide and PCB Quantitation Limits

			SOIL SEDIHENT
COMPOUND	CAS \$	VATER	SLUDGE
	310.04.4		
alpha-BBC	319-84-6	0.05 ug/L	8 ug/Kg
beta-BHC	319-85-7	0.05	8
delta-BHC	319-86-8	0.05	8
gamma-B <b>BC</b> (Lindane)	58-89-9	0.05	8
Heptachlor	76-44-8	0.05	8
Aldrin	309-00-2	0.05	8
Reptachlor epoxide	1024-57-3	0.05	8
Endosulfan I	9 <b>59</b> -98 <b>-8</b>	0.05	8
Dieldri <b>n</b>	60-57-1	0.10	16
4,4'-DD <b>E</b>	72-55-9	0.10	16
Endri <b>n</b>	72-20-8	0.10	16
Endosulfan II	33213-65-9	0.10	16
4,4'-DDB	72-54-8	0.10	16
Endosulfan sulfate	1031-07-8	0.10	16
4,4'-DDT	50-29-3	0.10	16
Methoxychlor (Mariate)	72-43-5	0.5	80
Endrin ketone	53494-70-5	0.10	16
alpha-Chlordane	5103-71-9	0.5	80
gamma-chlordane	5103-74-2	0.5	80
Toxaphe <b>ne</b>	8001-35-2	1.0	160
AROCLOR-1016	12674-11-2	0.5	80
AROCLOR-1221	11104-28-2	0.5	80
AROCLOR-1232	11141-16-5	0.5	80
AROCLOR-1242	53469-21-9	0.5	80
AROCLOR-1248	12672-29-6	0.5	80
AROCLOR-1254	11097-69-1	1.0	160
AROCLOR-1260	11096-82-5	1.0	160

#### MICHIGAN DEPARTMENT OF NATURAL RESOURCES SURFACE WATER QUALITY DIVISION POINT SOURCE MONITORING

Report of an
Industrial Wastewater Survey
Conducted at
Menasha Corporation
Paperboard Division
All Outfalls No. 030019
NPDES No. MI0003824
Allegan County
Ostego, MI
05/01/90

#### SURVEY SUMMARY

Wastewater monitoring was performed during one twenty-four hour survey period starting Tuesday May 1, 1990.

The results of this survey are compared to the final limitations in the facility's National Pollutant Discharge Elimination System (NPDES) Permit, No. MI0003824, in Table 4.

The results of this survey are compared to the results reported by the facility in their May Discharge Monitoring Report (DMR) in Table 4.

A grab sample from outfalls 030171 (000), 030134 (002), and 030055 (004) were split with the facility to compare laboratory analyses. The results are shown in Table 5.

The results of the physical and chemical analyses are presented in Tables 1 & 2. The results of the organic scan analyses are presented in Table 3.

RECEIVED

SEP 13 1990

SWQD-Plainwell

Scan 3-Chlorinated Hydrocarbons, FCBs & Organochlorine Pesticides 030171 (000) Outfall

Matrix water Sample Type composite Survey Period from to
Dilution Factor 05/01/90 1040 05/02/90 1040

Dilution Factor		1	
		ug/l	
Aldrin	<	.01	ND
*Aroclor 1016	<	.05	ND
*Aroclor 1221	<	.05	ND
*Aroclor 1232	<	.05	ND
Aroclor 1242	<	.05	ND
*Aroclor 1248	<	.05	ND
Aroclor 1254	<	.05	ND
Aroclor 1260	<	.05	ND
*Aroclor 1262	<	.05	ND
*Aroclor 1268	<	.05	ND
a-BHC	<	.01	ND
b-BHC	<	.01	ND
d-BHC	· (	.01	ND
g-BHC (lindane)	<	.01	ND
BP-6 (PBB)	<	.05	ND
a-Chlordane	ζ.	.01	ND
g-Chlordane	<	.01	ND
2-Chloronaphthalene	<	.2	ND
4,4'-DDD	ζ.	.01	ND
4,4 <sup>-</sup> -DDE	<	.01	ND
1,4'-DDT	ζ.	.01	ND
4.4'-DDT	<	.01	ND
1,2-Dichlorobenzene	ć	.1	ND
1,3-Dichlorobenzene	<	.1	ND
1,4-Dichlorobenzene	<	.1	ND
Dieldrin	<	.01	ND
Endosulfan I	ζ.	.01	ND
Endrin	<	.01	ND
Heptachlor	<	.01	ND
Heptachlor epoxide	Ž.	.01	ND
Hexabromobenzene	Ċ	.01	ND
Hexachlorobenzene	<	.01	ND
Hexachlorobutadiene	<	.01	ND
Hexachlorocyclopentadiene	· (	.01	ND
Hexachloroethane	<	.01	ND
Methoxychlor	ζ.	.01	ND
Mirex	<	.01	ND
Pentachlorobenzene	<	.01	ND
Pentachloronitrobenzene	<	.01	ND
1,2,3,4-Tetrachorobenzene	<	.01	ND
1,2,4,5-Tetrachlorobenzene		.01	ND
*Toxaphene	ζ.	.05	ND
1,2,3-Trichlorobenzene	ζ	.01	ND
1,4,4-Trichlorobenzene	ζ	.01	ND
1,3,5-Trichlorobenzene	· .	.01	ND
1,0.0 II IOMIOI ODGIIZGIIG	•	. • •	.12

<sup>\*</sup> Seldomly encountered, reported semi-quantitatively



# MENASHA CORPORATION

14 April 1982

Department of Natural Resources Region III, Secondary Complex P.O. Box 30028 Lansing, MI 48909 Attn: Virginia Loselle

Dear Virginia;

Please find enclosed the results of the leachate analysis on fly ash, ash-lime sludge, hydrapulper rejects, and hydrapulper tail.

The samples were collected over a months time. The fly ash samples 2382, 3082, and 2182, were days when only coal from one supplier was used.

The ASTM Procedure D-3987 was used for all the leachate analysis.

If you have any questions, please feel free to call John Blauwkamp or myself.

Sincerely,

Menasha Corporation Otsego Paperboard Division

Gary E√ Roys

Process Chemist & Group Leader

Enclosure

GR/kj

cc: John Blauwkamp Elizabeth Bols

Parameter	Composite Fly Ash	2382 Fly Ash	3082 Fly Ash	2182 Fly Ash	Ash Lime Sludge	Nejects	Hydrapulper <u>Tail</u>
PCB mg/1 5*	N.D.	N.D.	N.D.	N.D.	N.D.		
TOC mg/1	<b>4</b> 1	1	1	1	5	340	280
Magnesium mg/1	4.2	5	6.6	8.2	1.2	3.4	1.5
Total Organic Nitrogen mg/l						3.4	1.4
Nitrite-N mg/l						0.07	0.02
Zinc mg/l					•	0.52	0.19
Potassium mg/l						8.3	.5.4

## N.D. - None Detected

1\* Detection limit <2 mg/l
2\* Detection limit <.003 mg/l
3\* Detection limit <.005 mg/l
4\* Detection limit <.0002 mg/l
5\* Detection limit <0.2 mg/l

Michigan Department of Natural Resources
Water Quality Division
Biology Section
November, 1982

Macroinvertebrate and Sediment Chemistry Survey of the Kalamazoo River, Kalamazoo to Allegan,
July 22 and October 7, 1982

Biology Section personnel sampled the Kalamazoo River at nine locations between Morrow Dam and Allegan on July 22, 1982 to assess stream quality in the vicinity of the Kalamazoo Wastewater Treatment Plant (WWTP) discharge. A follow-up stream survey was performed by boat on October 7, 1982. Benthic macroinvertebrate and sediment chemistry samples, along with stream observations, were used to determine stream quality.

#### Conclusions

- 1. Stream quality between Morrow Dam and the Portage Creek confluence was good Benthic macroinvertebrate communities were typical of those found in good quality warmwater streams.
- 2. Portage Creek had minimal influence on the benthic macroinvertebrate communities of the Kalamazoo River. The river macroinvertebrate communities changed slightly below the Portage Creek confluence, likely due to reduced habitat and shifting sand substrate.
- 3. Stream conditions typical of organic enrichment were found on July 22 and October 7, 1982 one kilometer downstream of the Kalamazoo WWTP discharge and extended for sixteen river kilometers, where sampling was concluded. The macroinvertebrate community in this stream reach shifted to primarily sowbugs, leeches, snails, blackflies and midges accompanied by profuse growths of the filamentous green algae Cladophora. These results, along with previous survey results, indicate organic enrichment from the Kalamazoo WWTP is a continuing problem in the river.
- 4. Oily, clay-like paperfiber deposits were found in the Kalamazoo River downstream of the Portage Creek-Kalamazoo River confluence and near Plainwell and Otsego. These deposits contained the highest concentrations of PCBs found in the Kalamazoo River during this survey. Newly deposited fine sediments in Portage Creek contained the highest PCB concentration found in this survey (85 mg/kg).
- 5. Suspended white particulate material, originating from the Plainwell Paper Company discharge was present on July 22 and October 7, 1982 in the southern quarter of the Kalamazoo River from the point of discharge to the US-131 bridge, about one kilometer downstream of the paper company's discharge. This white material covered all substrate in the slow current regions on the south side of the river.

and dominated by mayflies, caddisflies, scuds and blackflies (Table 1). These communities were similar to those found in the 1976 and 1978 surveys (Creal and Johnson, 1980; Wuycheck, in prep.).

The river downstream of the confluence with Portage Creek (Station 3) had a slightly impacted benthic macroinvertebrate community on July 22. Although fewer taxa were present and estimated overall abundance was lower, the community was still dominated by mayflies, caddisflies and scuds. The slight shifts in community structure were likely due to the reduced macroinvertebrate habitat and predominance of shifting sand substrate.

Downstream of the Kalamazoo WWTP discharge on both July 22 and October 7, 1982, for a distance of about ten river kilometers (Stations 4-7), the benthic macro-invertebrate communities were dominated by sowbugs (Asellus), leeches, the snail Physa, blackflies and midges. This river reach also contained profuse growths of the green filamentous algae Cladophora. This shift in the biologica community is a classical river response to discharges of organic matter, particularly sanitary sewage, as described by Hynes (1960). Hynes (1960) refer to such a biotic response as the "Asellus/Cladophora zone". The presence of this type of a community demonstrates the waste load from the Kalamazoo WWTP has exceeded the normal biological community's ability to assimilate wastes.

Downstream of the Plainwell, Otsego, and Trowbridge Dams on July 22, the river recovered slightly from the organic loading discharged by the Kalamazoo WWTP. Cladophora growths were absent and the macroinvertebrate community was less dominated by sowbugs, leeches, blackflies and Physa. However, the biological communities were not similar to the biota found upstream of the Kalamazoo WWTP indicating that organic enrichment effects continued further downstream.

In summary, macroinvertebrate communities were adversely impacted by organic enrichment from the Kalamazoo WWTP for a distance of more than 16 river kilomether Previous macroinvertebrate surveys (Hesse and Willson, 1972; WAPORA, 1976; Wuycheck, in prep.; Creal and Johnson, 1980) found similar conditions in this stream reach. Since the expected recovery time for macroinvertebrates is one or less when this type of pollution is corrected (Hynes, 1960), organic enrich of the stream by the Kalamazoo WWTP remains a continuing problem. A fish community survey conducted during July-August, 1982 found similar impacts (Nel pers. comm.). The fish community at Comstock was good with smallmouth bass an redhorse dominating the community. Downstream of the Kalamazoo WWTP the commun was composed primarily of carp. These conditions continued through the Trowbridge Dam area, where a slight recovery in the fish community was found.

#### Sediments

All detectable PCBs in sediments were Arochlor-1242 (Table 3). Newly deposite sediments in the downstream portion of Portage Creek contained relatively high PCB concentrations (85 mg/kg), as did sediments in the Kalamazoo River downstr of the Portage Creek confluence (Station 3 - 57 mg/kg). Sediment PCB concentrations declined in the Kalamazoo River downstream (Stations 4 and 5), but increased again where paperfiber deposits were noted (Stations 6-8). Sediment samples at Stations 3, 6, 7, and 8 all contained a sub-sample taken from the oily, claylike paperfiber deposits. The increased concentrations found in these samples indicate that these oily, claylike paperfiber deposits contain

high PCB concentrations. No identifiable trends were noted between 1976 and 1982 (Table 3). At two stations (Portage Creek and in the Kalamazoo River downstream of the Portage Creek confluence) sediment PCB concentrations increased dramatically since 1976.

Mercury concentrations in the Kalamazoo River increased steadily from <0.25  $\pi$  above the confluence with Portage Creek (Station 2) to 3.6 mg/kg downstream f the Kalamazoo WWTP (Station 4) (Table 3). Concentrations then declined to 0.4 mg/kg at D-Avenue (Station 5). These results are consistent with 1976 sediment samples collected from similar locations (Wuycheck, in prep.) and somewhat higher than one 1971 sample collected at Station 4 (0.40 mg/kg) (Hes and Willson, 1972).

Other sediment impacts were noted within and downstream of the City of Kalama Oils were found on July 22 in the stream sediments at Stations 3-8 (Table 4) while oily, claylike paperfiber deposits were observed at Stations 3 and 8. Suspended white particulate material, apparently paperfiber, was noted in the water in the southern quarter of the river downstream of Plainwell Paper Comp on both July 22 and October 7, 1982. The white material coated all substrate in slow current regions on the south side of the river. The source of this w material was the Plainwell Paper Company discharge.

Field Work By: John Robinson, Aquatic Biologist

John Wuycheck, Aquatic Biologist William Creal, Aquatic Biologist

Report By: William Creal, Aquatic Biologist

Biology Section

Water Quality Division

Michigan Department of Natural Resources

Table 3. Sediment sampling results from the Kalamazoo River, vicinity of Kalamazoo, Otsego and Plainwell, July 22, 1982. All values are mg/kg dry weight basis unless otherwise noted. Sampling results from 1976 (Wuycheck, in prep.) are in parenthesis.

Station Number	•	Total Solids (%)	Mercury	PCB A-1242	PCB A-1254	PCB A-1260
2	Kings Highway	58 (28)	<0.25 (0.81)	<0,050 (5,68)	<0.050 (2.05)	<0.050 (<0.50)
-	Michigan Avenue (Portage Creek)	<b>49</b> (20)	0.9 (1.8)	85.0 (<0.50)	<0.050 (<0.50)	<0.050 (<0.50)
3	Patterson Avenue	45 (22)	1.4 (2.0)	57.0 (9.9)	<0.050 (2.44)	<0.050 (<0.50)
4	Commerce Street Railroad Crossing	40 (13)	3.6 (1.8)	<1.0 (5.54)	<0.050 (2.63)	<0.050 (<0.50)
5	D Avenue	34 (18)	0.4 (0.61)	1.6 (8.04)	<0.050 (2.26)	<0.050 (<0.50)
6	Railroad Crossing Plainwell	59 (17)	-	14.0 (2.06)	<0.050 (<0.50)	<0.050 (<0.50)
7	US-131 Bridge	35 (17)	- -	3.5 (5.66)	<0.050 (1.75)	<0.050 (<0.50)
8	M-89	35 (26)	<u>-</u>	27.0 (33.8)	<0.050 (32.8)	<0.050 (<0.50)

#### ANALYTICAL REPORT

To: Michigan Disposal Service

100 E. North St. Kalamazoo MI 49007

Attn: D.O. Cummins

Project No.: 920495
Client No.: 1983
Project Date: 3/04/92
Date Promised: 3/25/92

Date Reported:

3/25/52

PO#:

Project Desc.: Analysis of seven waste samples.

Sample No.: 920495-05 Sample type: waste Rec'd on: 3/04/92 ID: "Composite of Menasha Rejects, 2/12, 2/14, 2/18, & 2/26"

Phenols, total PCB, total Sulfide TCLP report Arsenic, total	<0.5 <25 See attached	mg/kg mg/kg mg/kg
Barium, total	<5	mg/kg
Cadmium, total	<0.5	mg/kg
Chromium, total	10	mg/kg
Copper, total	2	mg/kg
Iron, total	180	mg/kg
Lead, total	2	mg/kg
Mercury, total		mg/kg
Selenium, total	<0.5	mg/kg
Silver, total	· <0.5	mg/kg
Zinc, total	. 6	mg/kg

KAR Laboratories, Inc.

### ANALYTICAL RESULTS

To: Michigan Disposal Service

Project No: 920908 Report Date: 4/24/92

Project Desc.: Analysis of seven waste samples.

Sample No.:920908-05 Type:TCLP le. Rec'd: 3/04/92 ID: TCLP Leachate of Composite of Menasha Rejects, (920495-05T)

Arsenic, total, low level 0.002 mg/L Selenium, total, low level <0.002 mg/L

# TABLE 3 PESTICIDES & PCB's Results for Menasha Corporation Received May 5, 1992. Reported June 29, 1992. Expressed as micrograms per liter $(\mu g/\ell)$ .

Parameter	Sludge Sample
aldrin (0.08)	*
dieldrin (0.23)	*
4,4'-DDT (0.04)	*
4,4'-DDE (0.02)	*
4,4'-DDD (0.02)	*
alpha-endosulfan (0.06)	*
beta-endosulfan (0.17)	*
endosulfan sulfate (0.07)	*
endrin (0.02)	*
endrin aldehyde (0.01)	*
heptachlor (0.11)	*
heptachlor epoxide (0.04)	*
alpha-BHC (0.07)	*
beta-BHC (0.09)	*
delta-BHC (0.11)	*
gamma-BHC(lindane) (0.02)	*
chlordane (0.57)	*
toxaphene (2.9)	*
PCB-1016 (1.9)	*
PCB-1221 (9.3)	*
PCB-1232 (1.9)	*
PCB-1242 (1.9)	*
PCB-1248 (1.9)	*
PCB-1254 (2.6)	*
PCB-1260 (2.6)	*
ESI #9205038	-1

<sup>\* =</sup> Below detection limit which is noted in parentheses.

AUG 03 '92 16+41 ANN ARBOR TECH SRVS/LABS Ann Arbor Technical Services, Inc.

8540 Jackson Road • Ann Arbor, Michigan 48103 • 313-995-0995

**USEPA METH** DATA SUMMARY

MEN00855

For: Mr. James Bralthwalte

Braithwaite Consultants, Inc.

3928 Varsity Drive

Ann Arbor, MI 48108

Project Michigan Disposal

#27013

P.16/38

Received by ATS

7/20/92

,,	,0.00	Sample I.D. / Sample Date					
Parameter	Units	Menasha TCLP Extract 7/15/92	Rock Tenn TCLP Extract 7/15/92				
Aroclor 1221	ug/L	<0.5	<0.5				
Arocior 1232	ug/L	<0.1	<0.1				
Aroclor 1242	ug/L	<0.1	<0.1	_			
Aroclor 1248	ug/L	<0.1	<0.1	-			
Aroclor 1254	ug/L	<0.1	<0.1				
Araclar 1260	ug/L	<0.1	<0.1	_			
				-			
Total PCB	ug/L	<1	<1	-			
				-			

Menasha Method 608 PCB Analysis Project #0293014 March 23, 1993 Menasha Method 608 PCB Analysis Project #0293014

## **Narrative**

Five samples were received on 24 February 1993 for PCB analysis. The samples were as follows:

Client ID		Lab ID
22293	#1 PM Medium	0293014-1
22393001	Weir	0293014-2
22393003	Weir	0293014-3
22393	Sludge	0293014-4
2293	Spent Liquor	0293014-5

## Sample Results

None of the samples had peak patterns conforming to the available standards; AR-1016, AR-1221, AR-1232, AR-1242, AR-1248, AR-1254, and AR-1260. The instrument detection limit for AR-1254 as an example arochlor are reported. The minimum detection limit was then calculated for each sample. The data indicate with 99% certainty that there are no PCBs present at more than 4.65 ppb in the sample "22393003 Weir" to 45.99 ppb in sample "2293 Spent Liquor." The minimum detection limit for the paper sample (#1 PM Medium) was 460 ppb.

## **Quality Control**

The analyte single point calibrations were performed on the day of the sample analyses. Two distilled water samples each spiked with  $100~\mu g$  of AR-1254 and recoveries were calculated for at least five characteristic peaks of this arochlor on an OV-1 GC column and then confirmed on an OV-17 column. The lab spike (LS) average recovery was 127.0% on the OV-1 and 72.2% on the OV-17 column. The recoveries for the lab spike duplicate (LSD) was 72.5% on the OV-1 column and 78.1 on the OV-17.

The instrument detection limit was calculated as the 3-fold multiple of the standard deviation of three separate measurements of standard AR-1254 solution (0.1 mg/mL). First the average peak height was calculated for six characteristic peaks of this arochlor. The detection limit of each peak was then calculated by dividing the 3-fold multiple of the standard deviation and then multiplying it by  $100 \, \mu g/mL$ . The average detection limit for all six peaks was used as the reported instrument detection limit. This was  $4.6 \, \mu g/mL$ .

## **Details of Method**

The aqueous samples were filtered and the aqueous fraction extracted with three separate 60-mL aliquots of methylene chloride. The resulting emulsions were transferred to 40-mL VOA vials and centrifuged until the aqueous and organic layers separated. The aqueous layers were transferred to their respective separatory funnels and the organic layers were filtered through anhydrous sodium sulfate (heated at least 400° C for at least four hours). The sample was concentrated to dryness, redissolved in 1.0 mL of hexane and transferred to an autosampler vial for GC analysis.

The paper sample (0293014-1) was cut into small pieces and continuously extracted with 300 mL of a 5% ethyl ether in hexane solution by soxhlet for 14 hours. The extract was concentrated to dryness and redissolved in 1.0 mL of hexane for GC analysis.

A 1-2  $\mu$ L aliquot of each sample was injected into an electron capture gas chromatograph (ECD-GC). The GC was equipped with a 4 mm i.d. x 1.8 m column packed with 3% OV-1 on 100/200 mesh support in an oven at 185 °C. The injector and detector were 250 °C and 300 °C respectively. The carrier gas was P-5 mixture of methane/argon at 60 mL/min.

Positive results were subjected to a confirmation analysis using another ECD-GC. The column was a 4 mm i.d. x 1.8 m and packed with 1.5% OV-17 + 1.95% OV-202 on a 100/200 mesh support with the oven at 200 °C. The injector and detector were 250 °C and 300 °C respectively. The carrier gas was P-5 mixture of methane/argon at 60 mL/min.

All chromatographic data were acquired electronically by an HP-3396 Series II integrator and floppy disk drive.

## Data Analysis

The ratios of the peak heights for designated peaks of the sample and of the standard (injected daily) were multiplied by the concentration of the standard (100  $\mu$ g/mL) to determine the concentration in the 1.0 mL extract. This value was divided by the total volume (L) or mass (g) of sample extracted as follows:

$$(((A/V1)/(B/V2)) \times C)/D = \mu g/L \text{ or } \mu g/g$$

Where: A = Peak height of selected sample peak

B = Peak height of same std. peak

C = Concentration of std. (100  $\mu$ g/mL)

D = Volume (L) or mass (g) of sample

 $V1 = Volume of sample injected (\mu L)$ 

 $V2 = Volume of standard injected (\mu L)$ 

The final volume is multiplied by any required dilution factor.

Report prepared by:

Randall L. Detra, Ph.D

Senior Chemist, Triangle Labs-Columbus, Inc.

Data release by:

Ronald K. Mitchum, Ph.D

President, Triangle Labs-Columbus, Inc.

## DATA SUMMARY

DATA SUMMARY FOR PCB ANALYSIS BY ECD GAS CHROMATOGRAPHY Project #0293014.

		$\sim$	$\sim$	ப		$\sim$	n
A	п	U	u	п	Ŀ	u	n

									•				
Client #:	Descript.	Lab I.D.	Quant.	Unit	1016	1221	1232	1242	1248	1254	1260	MDL	
22293	#1 PM Medium	0293014 -1	9.997	g	ND	0.46 ug	/g (ppm)						
22392001	Weir	0293014 -2	0.97	L	ND	4.74 ug	/L (ppb)						
22393003	Weir	0293014 -3	0.99	L	ND	4.65 ug	/L (ppb)						
22393	Sludge	0293014 -4	0.42	L	ND	10.95 ug	/L (ppb)						
2293	Spent Liquor	0293014 -5	0.10	L	ND	45.99 ug	/L (ppb)						

**Instrument Minimum Detection Limit:** 

4.60 ug/mL

ND = Not detected at or above the MDL.

QC SUMMARY

## Lab Spike and Recovery of AR-1254 GC-Column: OV-1

Standard		;	0293014-LS		.S	Ave	:	127.(	
Rt	Height	шL	Ht/uL	Rt	Height	uL	HVuL	Dil	%Rec
21.753	464543	7.1	422311.8	21.540	151615	1.1	137831.8	2	65.:
18.130	5 <b>2875</b> 5	1.1	480686.4	17.827	229085	1.1	208259.1	2	86.7
15.344	6 <b>3236</b> 2	7.1	574874.5	15.112	498080	1.1	452800.0	2	157.5
10.180	70 <b>857</b> 4	1.1	644158.2	10.114	644971	1.1	586337.3	2	182.0
8.544	73 <b>78</b> 19	7:1	670744.5	8.461	530087	1.1	481897.3	2	143.7
		7							
		خ							
Standard		_		0293014-L	.SD	Average % Rec.:			72.5
Rt	Height	吐	Ht/uL	Rt	Height	uL	Ht/uL	Dil	%Rec
21.753	464543	7.1	422311.8	21.555	93084	1.0	97983.2	2	46.4
18.130	5 <b>28755</b>	7.1	480686.4	17.850	137960	1.0	145221.1	2	60.₄
15.344	632362	7.1	574874.5	15.139	204701	1.0	215474.7	2	<b>75.</b> 0
12.697	758623	7.1	689657.3	12.540	26 <b>61</b> 11	1.0	280116.8	2	81.2
10.180	708574	7.1	644158.2	10.048	25 <b>290</b> 9	1.0	266220.0	2	<b>82.</b> 7
8.544	73 <b>78</b> 19	7.1	670744.5	8.415	284942	1.0	299938.9	2	89.₽

# Lab Spike and Recovery of AR-1254 GC-Column: OV-17

Standard			0293014-LS			Ave	72.2			
Rt	Height	uL	Ht/uL	Rt	Height	uL	Ht/uL	Dil	%Rec	
22.453	805685	7	805685.0	22.441	339127	1.3	260866.9	2	64.8	
19.774	7 <b>27291</b>	1	727291.0	19.774	3 <b>2618</b> 6	1.3	250912.3	2	69.(	
17.485	454479	7	454479.0	17.490	195894	1.3	150687.7	2	66.3	
15.512	1076562	Ė	1076562.0	15.527	501382	1.3	385678.5	2	71.7	
13.590	1376444	7	1376444.0	13.605	6 <b>95210</b>	1.3	534776.9	2	77.7	
12.618	8 <b>46929</b>	Ė	846929.0	12.642	45 <b>6293</b>	1.3	350994.6	2	82.9	
9.988	1189537	7	1189537.0	10.015	5 <b>73692</b>	1.3	441301.5	2	74.2	
8. <b>94</b> 9	1051540	1	1051540.0	8.973	5 <b>06611</b>	1.3	389700.8	2	74.1	
5.763	8 <b>58923</b>	7	858923.0	5.776	38 <b>4689</b>	1.3	295914.6	2	68.9	
		1								
		1								
Standard		•		0293014-LSD			Average % Rec.:			
Rt	Height	uL_	Ht/uL	Rt	Height	uL	Ht/uL	Dil	%Rec_	
22.453	805685	1	805685.0	22.479	248262	1	248262.0	2	61.€	
19.774	727291	3	727291.0	19.810	254755	1	254755.0	2	70.1	
17.485	454479	3	454479.0	17.527	143734	1	143734.0	2	63.3	
15.512	1076562	7	1076562.0	15.564	3 <b>85348</b>	1	385348.0	2	71.6	
13.590	13 <b>76444</b>	7	1376444.0	13.645	531254	1	531254.0	2	77.2	
12.618	8 <b>46929</b>	•	846929.0	12.692	3 <b>32447</b>	1	332447.0	2	78.5	
9.988	1189537	٦	1189537.0	10.055	466447	1	466447.0	2	78.4	
8.949	1051540	1	1051540.0	9.003	452639	1	452639.0	2	86.1	
6.869	431547	1	431547.0	6.940	233366	1	233366.0	2	108.2	
5.763	858923	1	858923.0	5.829	3 <b>7033</b> 4	1	370334.0	2	86.2	

# CALCULATION OF INSTRUMENT MINIMUM DETECTION LIMIT (MDL) OF AR-1254 AS AN EXAMPLE PCB.

Rt	Rep. #1 Ht/uL	Rep. #2 Ht/uL	Rep. #3 Ht/uL	Avg.	s	3s	DL (ug/mL)	
5.746	471779	486464	463953	474065	11428	34285	7.23	
8.568	812978	834237	839390	828868	14001	42002	5.07	
10.226	7 <b>79</b> 739	781221	803764	788241	13463	40390	5.12	
15.401	758405	750610	763384	757466	6 <b>439</b>	19316	2.55	
18.165	613010	600811	609463	607761	6275	18825	3.10	
21.813	522217	506719	514986	514641	7755	23 <b>26</b> 4	4.52	
					Ava. M	IDL:	4.60	

Lab ID: 9304048-01 Collected: 04/06/91 "mple ID: Sludge 4693

mple id: Sludge 4693		lab ID:	9304048	5-01 Co.	llected: 04	/06/9.
TEST	RESULT	UNITS		ANALYZED	METHOD	MD
EPA Pesticides & PCBs				•	EPA 8080	
delta-BHC	BDL	μg/kg	as recd	04/28/93		0.7
gamma-BHC	BDL		as recd	04/28/93		0.4
Chlordane	$\mathtt{BDL}$		as recd	04/28/93		7.4
Toxaphene	$\mathtt{BDL}$		as recd	04/28/93		27
PCB-1016	$\mathtt{BDL}$		as recd	04/28/93		19
PCB-1221	BDL		as recd	04/28/93		51
PCB-1232	BDL		as recd	04/28/93		19
PCB-1242	BDL		as recd	04/28/93		15
PCB-1248	BDL		as recd	04/28/93		1(
PCB-1254	BDL		as recd	04/28/93		4.6
PCB-1260	BDL		as recd	04/28/93		15
Herbicides .					EPA 8150	
2,4-D	BDL	μg/kg	as recd	04/26/93		7.0
2,4,5-TP (Silvex)	BDL	μg/kg	as recd	04/26/93		0.70
Method 601 & 602 Volatiles					EPA 8240	
Benzene	BDL	μg/kg		04/26/93		4:
Bromodichloromethane	BDL	μg/kg		04/26/93		4 5
Bromoform	BDL	μg/kg		04/26/93		4!
Bromomethane	BDL	μg/kg		04/26/93		4 !
Carbon Tetrachloride	BDL	μg/kg		04/26/93		4 ۱
Chlorobenzene	BDL	μg/kg		04/26/93		4!
Chlorodibromomethane	BDL	μg/kg		04/26/93		4'
iloroethane	BDL	μg/kg		04/26/93	i	4.
Chloroform	BDL	μg/kg		04/26/93	<b>;</b>	4!
2-Chloroethyl Vinyl Ether	BDL	μg/kg		04/26/93	1	9,
Chloromethane	BDL	μg/kg		04/26/93		4:
1,2-Dichlorobenzene	BDL			04/26/93		4 '
1,3-Dichlorobenzene	BDL		•	04/26/93		4 ·
1,4-Dichlorobenzene	BDL			04/26/93		4 '
Dichlorodifluoromethane	BDL			04/26/93		4 '
1,1-Dichloroethane	BDL			04/26/93		4
1,2-Dichloroethane	BDL			04/26/93		4.
1,1-Dichloroethylone	BDL	μg/kg		04/26/93		4
cis-1,2-Dichloroethylene	BDL	μg/kg	ſ	04/26/93		4
trans-1,2-Dichloroethylene	BDL			04/26/93		4
1,2-Dichloropropane	BDL			04/26/93		10
cis-1,3-Dichloropropylene	BDL			04/26/93		4
trans-1,3-Dichloropropylene	BDL			04/26/93		4
Ethyl benzene	46			04/26/9:		4
Methylene Chloride	BDL			04/26/93		22
1,1,2,2-Tetrachloroethane	BDL			04/26/93		4
Tetrachloroethylene	BDL			04/26/93		4
Toluene	BDL			04/26/9		4
1,1,1-Trichloroethane	BDL			04/26/9		4
1,1,2-Trichloroethane	5 <b>5</b>			04/26/9		4
Trichloroethylene	BDL			04/26/9		4
Trichlorofluoromethane	BDL			04/26/9		5
Vinyl Chloride	BDL			04/26/9		4
ylene	80	μg/kg	3	04/26/9	٤	4

ample ID: Sludge 4693 Lab ID: 9304094-01 Collected: 04/13/9

rest	RESULT	UNITS			ANALYZED	METHOD	MI
EPA Pesticides & PCBs						EPA 8080	<u></u>
beta-BHC	BDL	μg/kg	as	recd	04/28/93		1.
delta-BHC	0.64	μg/kg	as	recd	04/28/93		0.2
gamma-BHC	0.58	μg/kg	as	recd	04/28/93		0.02
Chlordane					04/28/93		1
Toxaphene					04/28/93		1.
PCB-1016					04/28/93		1.
PCB-1221					04/28/93		9.
PCB-1232					04/28/93		1.
PCB-1242					04/28/93		10
PCB-1248					04/28/93		1.
PCB-1254					04/28/93		8.
PCB-1260					04/28/93		8.
Herbicides	202	m9/109	<b></b>	1000	0.,20,33	EPA 8150	٠.
	זחם	ua/ka	26	racd	04/26/93	FLW 0130	7.
2,4-D					04/26/93		0.7
2,4,5-TP (Silvex)	שטם	μg/kg	as	recu	04/20/93		0.7
Method 601 & 602 Volatiles	PDI				04/22/02	EPA 8240	
Benzene		μg/kg			04/23/93		1
Bromodichloromethane		μg/kg			04/23/93		1
Bromoform		μg/kg			04/23/93		1
Bromomethane		μg/kg			04/23/93		1
Carbon Tetrachloride		μg/kg			04/23/93		1
Chlorobenzene		μg/kg			04/23/93		
Chlorodibromomethane		μg/kg			04/23/93		1
Chloroethane		μg/kg			04/23/93		1
Chloroform		μg/kg			04/23/93		-
2-Chloroethyl Vinyl Ether		μg/kg			04/23/93		:
Chloromethane		μg/kg			04/23/93		:
1,2-Dichlorobenzene		μg/kg			04/23/93		:
1,3-Dichlorobenzene		μg/kg			04/23/93		
1,4-Dichlorobenzene		μg/kg			04/23/93		;
Dichlorodifluoromethane		μg/kg			04/23/93		
1,1-Dichloroethane		μg/kg			04/23/93		
1,2-Dichloroethane		μg/kg			04/23/93		
1,1-Dichloroethylene		μg/kg			04/23/93		
cis-1,2-Dichloroethylene	BDL	μg/kg	Ī		04/23/93		
trans-1,2-Dichloroethylene	BDL	, μg/kg	ſ		04/23/93	3	
1,2-Dichloropropane	BDL	, μg/kg	Ş		04/23/93	3	
cis-1,3-Dichloropropylene	BDI	μg/kg	1		04/23/93	3	
trans-1,3-Dichloropropylene	BDL	$\mu g/kg$	J		04/23/93	3	
Ethyl benzene	BDI	$\mu g/kg$	1		04/23/93	3	
Methylene Chloride	BDI	$\mu g/kg$	1		04/23/93	3	
1,1,2,2-Tetrachloroethane		$\mu g/kg$			04/23/93	3	
Tetrachloroethylene		μg/kg			04/23/93		
Toluene		μg/kg			04/23/93		
1,1,1-Trichloroethane		μg/kg			04/23/9:		
1,1,2-Trichloroethane		μg/kg			04/23/93		
Trichloroethylene		μg/kg			04/23/93		
Trichlorofluoromethane		$\mu g/kg$			04/23/93		
		$\mu g/kc$			04/23/93		
Vinyl Chloride							

BDL = Below Detection Limit

MDL = Method Detection Limit Page 3 of 3

3am;	ole	ID:	Sludge	42093	Lab ID: 9304139-01 Collecte	ed: 04	/20	15
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TEST	RESULT	UNITS			ANALYZED	METHOD	MD
EPA Pesticides & PCBs						EPA 8080	
beta-BHC	BDL	μg/kg	as	recd	04/28/93		5.
delta-BHC					04/28/93		0.3
gamma-BHC	BDL	μg/kg	as	recd	04/28/93		0.03
Chlordane					04/28/93		3
Toxaphene	BDL	μg/kg	as	recd	04/28/93		7
PCB-1016	BDL	μg/kg	as	recd	04/28/93		2.
PCB-1221	BDL	μg/kg	as	recd	04/28/93		1.
PCB-1232	BDL	μg/kg	as	recd	04/28/93		2.
PCB-1242					04/28/93		10
PCB-1248	BDL	μg/kg	as	recd	04/28/93		2.
PCB-1254					04/28/93		4.
PCB-1260	BDL	μg/kg	as	recd	04/28/93		1
Herbicides						EPA 8150	
2,4-D					04/26/93		7.
2,4,5-TP (Silvex)	BDL	μg/kg	as	recd	04/26/93		0.7
Method 601 & 602 Volatiles						EPA 8240	
Benzene	BDL	μg/kg			04/23/93		1
Bromodichloromethane	BDL	μg/kg			04/23/93		1
Bromoform	BDL	μg/kg			04/23/93		1
Bromomethane	BDL	μg/kg			04/23/93		1
Carbon Tetrachloride	BDL	μg/kg			04/23/93		1
Chlorobenzene	BDL	μg/kg			04/23/93		1
Chlorodibromomethane	BDL	μg/kg			04/23/93	•	1
Chloroethane	BDL	μg/kg			04/23/93	<b>\</b>	1
Chloroform	BDL	μg/kg			04/23/93	}	1
2-Chloroethyl Vinyl Ether	BDL	μg/kg	•		04/23/93	3	2
Chloromethane	BDL	μg/kg			04/23/93	3	1
1,2-Dichlorobenzene		μg/kg			04/23/93		1
1,3-Dichlorobenzene		μg/kg			04/23/93		
1,4-Dichlorobenzene		μg/kg			04/23/93		
Dichlorodifluoromethane		, μg/kg			04/23/93		
1,1-Dichloroethane		μg/kg			04/23/93		•
1,2-Dichloroethane		, μg/kg			04/23/93		-
1,1-Dichloroethylene		$\mu g/kg$			04/23/93		
cis-1,2-Dichloroethylene		ı μg/kç			04/23/93		
trans-1,2-Dichloroethylene		μg/kg			04/23/93		
1,2-Dichloropropane		μg/kg			04/23/93		
cis-1,3-Dichloropropylene		μg/kg			04/23/93		,
trans-1,3-Dichloropropylene		μg/kg			04/23/93		
Ethyl benzene		μg/kg			04/23/93		
Methylene Chloride		μg/kg			04/23/93		
1,1,2,2-Tetrachloroethane		μg/kg	-		04/23/93		
Tetrachloroethylene		μg/kg			04/23/9		
Toluene		L μg/kg			04/23/9		
1,1,1-Trichloroethane		L μg/ko			04/23/9		
1,1,2-Trichloroethane		$\mu g/kc$			04/23/9		
Trichloroethylene		$\mu g/kc$			04/23/9		
Trichlorofluoromethane		μg/ko			04/23/9		
Vinyl Chloride		L μg/kg			04/23/9		
Xylene	BDI	L μg/k	J		04/23/9	J	

BDL = Below Detection Limit

# STORM WATER TESTS

**DOCUMENT #26** 



## PAPERBOARD DIVISION

## MENASHA CORPORATION

TO:

Keith Kling

FROM:

Len Myers

DATE:

July 20, 1992

SUBJECT:

Storm Water Testing Procedure

On July 13th and 14th, Robert Mesec from Environmental Science & Engineering was on site to determine what storm water outfalls would require sampling. With Gary Roys's assistance, ESE determined there to be three (3) outfalls that require testing:

- 1. The storm water discharge point at the old 002 location.
- 2. The storm water discharge from the south side of the Powerhouse, located just west of the dam.
- 3. The storm water outfall from River Road, located just west of #1 clarifier.

During a "representative" rain event, four (4) types of data will be recorded:

- 1. Rain fall depth from a rain gauge;
- 2. Depth of flow from each of the outfalls;
- 3. Velocity of flow from each of the outfalls;
- 4. Collection of storm water samples from each outfall.

A "representative" rain event must meet two criteria:

- 1. The rain event that is sampled must have occurred after 72 hours (3 days) of dry weather. "Dry" is defined as no storms with grater than 0.1 inches of rainfall during these 3 days.
- 2. At least 0.1 inches of rain should fall before the rain event is considered "representative".

## FIELD WORK DURING A RAIN EVENT

- 1. <u>Sampling</u> Storm water samples will be collected from each outfall every 20 minutes during the rain event for the first 3 hours of the storm (or duration of the storm if it lasts less than three hours). During the first 20 minutes of the rain event, two samples will be collected from each outfall. One will be used as the grab sample and the other will be used for the composite. All other times, only one sample will be collected from each outfall.
- 2. <u>pH Measurements</u> Before pouring the grab sample to the sample jar, pH will be measured at each outfall.
- 3. <u>Flow Measurements</u> Depth and velocity measurements will be collected at each sampling location, with the exception of the powerhouse outfall due to the location of the discharge pipe.
- 4. Rain Gauge Measurements During each 20 minute cycle in which we will be collecting samples and recording depth and velocity measurements, we will also be recording rain levels from the rain gauge.
- 5. <u>Sample Packaging</u> After the rain event is over, the samples will be packed into individual coolers provided by ESE's Chicago office. The coolers will then be shipped by overnight service to ESE's Chicago office. Copies of the data collected will also immediately be faxed to ESE. ESE Chicago must have the faxed data <u>before</u> the samples arrive at the laboratory.

cc: Gary Roys
Paul Jachim

MID006012405

Approval expir MEN00872

-orm 2F COES



United States Environmental Protection Agency Washington, DC 20460

## Application for Permit To Discharge Stormwater Discharges Associated with Industrial Activity

Paperwork Reduction Act Notice

Public reporting burden for this application is estimated to average 28.6 hours per application including time for reviewing instructions Public reporting burden for this application is estimated to average 20 of floors per application including time for reviewing instructions searching existing data sources, gathering and maintaining the data needed, and completing and feviewing the collection of information. Send comments regarding the burden estimate any other aspect of this collection of information or suggestions for improving this form nature no suggestions which may increase or reduce this burden to. Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency. 401 M.St., SW. Washington. DC 20460 or Director, Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503

Outfall Location		, t ye e '		: '			ting the second control of the first termination and the second control of the second co
For each outfall, list the	latitude and	longitude	of its loca	tion to the	nearest 1	5 seconds	and the name of the receiving water
A Outfall Number							O Receiving Water
(list)		B Latitude	)		Longitud		(name)
A	85	41	33"	42	27'	42"	KALAMAZOO RIVER
В	85	41	30"	42	27'	42"	KALAMAZOO RIVER
С	85	41	27"	42	27'	42"	KALAMAZOO RIVER
001	85	41	32"	42	27'	42"	KALAMAZOO RIVER
002	85	41'	32"	42	27'	42"	KALAMAZOO RIVER
003	.85	41'	31"	42	27'	42"	KALAMAZOO RIVER
note: non-	stormwai	er dis	charge	s are	not i	aclude	in this section
refe	r to NPI	ES Per	mit No	. MIO	03824		
Improvements							lander filmer i Franklich beginnt gewicht der Franklich geschieben der Aufter der Aufter der Aufter der Aufter

Are you now required by any Federal, State, or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions

				4 Final . Compliance Date		
1 identification of Conditions	2	Affected Outlalls		Complia	ince Cate	
Agreements, Etc.	number	source of discharge	3 Brief Description of Project	a req	ים סנסו	
N/A		N/A	N/A		<u> </u>	
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You may attach additional sheets describing any additional water pollution (or other environmental projects which may affect your discharges) you now have under way or which you plan. Indicate whether each program is now under way or planned, and indicate your actual or planned schedules for construction

III. Site Drainage Map

Attach a site map showing topography (or indicating the outline of drainage areas served by the outlati(s) covered in the application topographic map is unavailable) depicting the facility including each of its intake and discharge structures, the drainage area of each size water outfall, paved areas and buildings within the drainage area of each storm water outfall, each known past or present areas used. outdoor storage or disposal of significant materials, each existing structural control measure to reduce pollutants in storm water materials loading and access areas, areas where pesticides, herbicides, soil conditioners and fertilizers are applied, each of its hall waste treatment storage or disposal units (including each area not required to have a RCPA permit which is used for accumulating haza 2 waste under 40 CFR 262 34), each well where fluids from the facility are injected underground, springs, and other surface water bodies  $\sim$ receive storm water discharges from the facility

TFALL A

Approval expires 5-31 92

. Discharge li			7	3 - 1 C	
Oundhere of the	MIACO STIAL	li opiiouad	una naan		m > -1
THECHAIUS II	HIOMMANON	Continued	II UIII Daub	0000	111 61 /

part A. You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each purfail. See instructions for additional details.

	Maximu	m Values	Averag	e Values	Number	
Pollutant	(includ	le units)	(includ	de units)	of	
and TAS Number (if available)	Grab Sample Taken Ounng First 30 Minutes	Flow-weighted Campasite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Storm Events Sampled	Sources of Pollutants
and Grease	14 <sup>mg</sup> /L	-			1	
logical Oxygen	32 <sup>mg</sup> /L	$_{26}$ mg/ $_{ m L}$			1	
nemical Oxygen mand (COD)	178 <sup>mg</sup> /L	170 <sup>mg</sup> /L			1	
al Suspended olids (TSS)	128 <sup>mg</sup> /L	63 <sup>mg</sup> /L			1	
fal Kjeldahl rogen	2.08 <sup>mg</sup> /L	2.23 <sup>mg</sup> /L			1	
itrate plus itrite Nitrogen	1.07 <sup>mg</sup> /L	0.86 <sup>mg</sup> /L			1	·
tal oschorus .	0.51 <sup>mg</sup> /L	0.49 <sup>mg</sup> /L			1	
н	Minimum 6.66	Maximum	Minimum	Maximum		

Part B - List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall See the instructions for additional details and requirements.

	Maximur	n Values	Average	Values	Number		
Pollutant	(include	units)	(include	o units)	of		1
and	Grab Sample		Grab Sample		Storm		1
3 Number	Taken During First 30	Flow-weighted	Taken During First 30	Flow-weighted	Events		
, , available)	Minutes	Composite	Minutes	Composite	Sampled	Sources of Politrants	
. COPPER	0.010 <sup>mg</sup> /T.	$I \setminus P^{m} O I O O$			1 1		
ZINC	0.264 <sup>mg</sup> /I	0.167 <sup>mg</sup> /L			<u>lī</u>		
ORTHO-	0.22 <sup>mg</sup> /L	0.20 <sup>mg</sup> /L			1 1		
PHOSPHOR	pus						
ESIDUAL CI	_	_					
I. PHOSPHOR	DUS 0.51mg/L	0.49mg/L			i , i		
BOD	32mg/L	26 <sup>mg</sup> /L			11		
SS	128 <sup>mg</sup> /L	63mg/L			1-1-		
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Form Acoroved CMB No 2040.

FALL B

Approval expres 5-31-92

Discharge Information (Continued from page 3 of Form 2F)

Part A. You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

<u> </u>	Maximi	ım Values	Average Values		Number	• .
Pollutant	(inclu	de units)	(includ	le units)	ot	•
and (TAS Number of available)	Grab Sample Taken Dunng First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Storm Events Sampled	Sources of Pollutants
and Grease	Jwg\r	_			1	
ogical Oxygen liand (8005)	l <sup>mg</sup> /L	8mg/L			1	
emical Oxygen hand (COO)	ll <sup>mg</sup> /L	136 <sup>mg</sup> /L			1	
il Suspended	18 <sup>mg</sup> /L	54mg/L			1	
,'si Kjeldahl   ogen	0.49 <sup>mg</sup> /L	0.55 <sup>mg</sup> /L			1	
rate plus	0.08mg/L	0.26 <sup>mg/L</sup>			i	
al usphorus	0.18 <sup>mg</sup> /L	0.74 <sup>mg/</sup> L			1	
1	Minimum 7.69	Maximum	Minimum ·	·Maximum· .	· · · ·	

Part 8 - List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPCES permit for its process wastewater (if the facility is operating under an existing NPOES permit). Complete one table for each outlait

	Maximur	n Values	Average	e Values	Number	
Pollutant	(includ	e units)	(includ	le units)	of	
and Number available)	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Storm Events Sampled	Sources of Poliutants
COPPER	0.010 <sup>mg</sup> /L	0.010 <sup>mg</sup> /L			1 1	
ZINC	0.131 <sup>mg</sup> /L	0.109mg/L		<del> </del>	1	
ORTHO-	0.08mg/L	0.20 <sup>mg</sup> /L			i 1	<del> </del>
PHOSPHOR	ous	0.20 3/11		<del> </del>	<del>                                     </del>	
SIDUAL CI		-	<u> </u>	<del>                                     </del>	<del>                                     </del>	
PHOSPHOR	DUS 0.18mg/I.	0.74 <sup>mg</sup> /L		<del> </del>	1 1	
)	lmg/L	8mg/L	<del></del>	<del> </del>	1 1	
5	18 <sup>mg</sup> /L	54 <sup>mg</sup> /L		<del> </del>	1 1	
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Form Acoroved, CMB No. 2040-0086 Approval expres 5-31-92

ITFALL C

Discharge Information (Continued from page 3 of Form 2F)

- You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each putfall. See instructions for additional details.

	Maximum Values		Averag	e Values	Number	
Pollutant	(includ	le units)	(includ	le units)	of	
and CAS Number (if available)	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Camposite	Storm Events Sampled	Sources of Pollutants
and Grease	4mg/L	_			1	
rogical Oxygen mand (8005)	52 <sup>mg</sup> /L	49 <sup>mg</sup> /L			1	
emical Oxygen mand (COD)	476 <sup>mg</sup> /L	280 <sup>mg</sup> /L			1	
al Suspended lids (TSS)	168mg/L	40 <sup>mg</sup> /L			1	
al Kjeldahl rogen	5.41 <sup>mg</sup> /L	2.93 <sup>mg</sup> /L	<u>.</u>		1	
rate plus rite Nitrogen	1.34 <sup>mg</sup> /L	0.96 <sup>mg</sup> /L			1	
al osphorus """	0.96mg	0.93 <sup>mg</sup> /L			1.	
	Minimum 6.80	Maximum	Minimum	Maximum		

Minimum 6.80 Maximum Minimum Maximum

Part 8 - List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPCES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall See the instructions for additional details and requirements.

	Maximur			e Values	Number	
Pollutant	(include	• units)	(includ	le units)	ot	•
and Number (if available)	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Storm Events Sampled	Sources of Policiants
. COPPER	0.010mg/L	0.010mg/L			1	
. ZINC	0.177 <sup>mg</sup> /L				1	
. ORTHO-	0.44mg/L	0.52 <sup>mg</sup> /L			1	
PHOSPHOR	ous					
ESIDUAL.CI		_			T -	
. PHOSPHOR	OUS 0.96mg/L	0.93 <sup>mg</sup> /L			1	
OD	52 <sup>mg</sup> /L	49 <sup>mg</sup> /L			ĺĺ	
SS	168mg/L	40 <sup>mg</sup> /L			1 1	
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1. Sec. 10.

Part C - List each pollutant shown in Tables 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the additional details and requirements, Complete one table for each outfall.

1	I	Maximum Valu			) (inc		rage Values clude units)				_	
Pollutant		<del></del>	(include i	units)								
	an:	1 7	rab Sample		Grab Sample Taken Dunng	. i •		Storm	1			
		ttun and	First 30	Flow-weighted	First 30	( , , , , , , , , , , , , , , , , , , ,	-	Events				
	(d avai	12010)	Minutes	Composite	Minutes	Com	posite	Sampled		Sources of P	entstyllo	
•							<u> </u>					
1	N/A	A			N/A							
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Į	Part D	- Pravide da	ta for the storm e	vent(s) which resu	ilted in the maxim	num values to	r the flow	weighted o	ompos	ute sample		
1	1	1 2. 3.			4.		5.			7.	8	
ł	Date of	Duration	Total rainfa	ul Number o	Number of hours between beginning of storm measured and end of previous measurable rain event		Maximum floe rate during rain event (gallons/minute or specify units		trom	Season sample was	Form of Precipitation	
ı	Storm	of Storm	during storm e	Deginning					int			
١	Event	(in minutes)	(in inches)	i di tra alla					(gailons of specify units)		(rainfail, snowmeit)	
1	sept.	110 min.	<del>/</del>							taken	3.7.0 .3.77017	
1	02				254.38			summer	rainfall			
	1992		288 hours		ft. per sec. cubic.		ft.					
4	1992			<del> </del>	<del></del>				<b></b>			
1		• • • • • • • • • • • • • • • • • • • •	"	approx	approximately		168.0 cubic		6	summer	rainfall	
_			1	288	288 hours		ft. per sec.				raimani	
į	11	11	11		approximately 288 hours		265.21 cubic		<del></del>	summer	noinf-31	
											rainfall	
			}			l PCI	3	CUDIC .				
		L	<u> </u>							<u> </u>		
	9. Pr	Provide a description of the method of flow measurement or estimate.										
	OUTFALL A & C - Flow rate was estimated by measuring velocity & flow depth approximate											

OUTFALL A & C - Flow rate was estimated by measuring velocity & flow depth approximately every 20 minutes & converting flow depth to cross-sectional area of flow based on the diamensions of the conveyance

OUTFALL B

- Flow rate was estimated using the Santa Barbara Runoff Hydrograph Method which calculates the runoff depth throughout the storm event based on cumulative rainfall and surface characteristics of the drainage basin and then converts depth to runoff rates

# CHEMICAL SUPPLIER GUARANTEES

# **DOCUMENT #27**

Hercules Incorporated

## **MHERCULES**

Hercules Plaza
1313 North Market Street
Wilmington, DE 19894-0001
(302) 594-5000

## REGULATORY AFFAIRS

June 9, 1995

Mr. Keith Kling Menasha Corporation 320 North Farmer Street Otsego, MI 49078

Dear Mr. Kling:

RE: Hercon® UBK Sizing Emulsion

This letter is in response to a request for information from Mr. Mike Schreitar. Hercules does not knowingly use nor reasonably expect the presence of polychlorinated biphenyls (PCBs) in Hercon UBK. However, this product has not been analyzed for PCBs.

I hope this letter will meet your needs; please feel free to contact me if further information is required.

Sincerely,

Gary E. Lee

Senior Regulatory Specialist

(302) 594-7139

GEL/elm

95junitr.5

cc: Mr. M. Schreiter - Menasha Corporation



MEN00879

Beta Weter Management Group 200 Witner Road Hordon, 14 19044-0998 215 674 9200

June 12, 1995

Mr. Keith Kling Menasha Corporation

Re: Polymer 1166L

Dear Mr. Kling:

This letter will certify that this product does not contain any polychiorinated biphenyls(PCBs).

If you have additional questions, please call me at 215-773-6107.

Sincerely,

BETZ WATER MANAGEMENT GROUP

Ted Ledeboer

Environmental Specialist

Environmental/Regulatory Affairs

Post-It brand fax transmitted memo 7671 # of pages > /

To KEITH KLING From Tim Ho NE

Co. MENASHA Co.SETZ

Phone # 473-6262

Fax # 616 - 692 - 2060 Fax 6 - 473 - 9460



Oakite Products, Inc.

Corporate Headquarters
50 Valley Road, Berkeley Heights, NJ 07922-2798

Tel. (908) 464-6900 / (800) 526-4473 Fax. (908) 464-4658

June 13, 1995

Mr. Mike Schreiter Menasha Corp. P.O. Box 155 Otsego, MI 49078

Dear Mr. Schreiter:

To follow up on our conversation this morning about our product Oakite Highlite, this letter is to confirm that Oakite Highlite does not contain PCB in its formulation.

We trust that this information will satisfy your requirements. Please let us know if you need further information.

Sincerely,

Michael Chang, Manager

Timbel Chang

Health and Environmental Dept.

MC:js



WATER TREATMENT PRODUCTS
PAPER CHEMICALS
SURFACE TREATMENT PRODUCTS
COSMETIC INGREDIENTS
SPECIALTY BIOCIDES

June 13, 1995

Mr. Keith Kling Menasha Corporation 320 N. Farmer Street Otsugo, MI 49078

Dear Mr. Kling:

Please be advised that none of the below listed Calgon Corporation products was manufactured with nor are known to contain any polychlorinated biphenyls (PCBs).

Calgon 15S Hydraid 7706 BA-11 FP L-657

I trust this information will satisfy your needs. If you should have any questions, please do not hesitate to contact me.

Sincerely,

CALGON CORPORATION

Brian T. Laplante, Manager Toxicology and Product Safety

BTL/mld



Jack W. Horvath, TS&D Dept. 6310 Rothway, Suite 135 Houston, TX 77040

June 20, 1995

Mr. Keith King Environmental Manager Menasha Corporation P.O. Box 155 Otsego, MI 49078-0155

Dear Mr. King:

In reply to the letter from your Mr. Mike Schreiter, dated June 13, HydroChem Technical Service and Development (TS&D) Department offers the following statement.

Hydrochem has several chelant products marketed under the trade name Vertan (Vertan 665, Vertan 675, etc.). To the best of our knowledge, none of these products contains any PCB's. Further, they are not manufactured with PCBs.

HydroChem and its employees thank you for using our services and products. Please feel free to contact me if you require further information.

Sincerely,

CC: Steve Barber

Tom Carter

**Greg Casey** 

Pat Debusk

Wayne Frenier

Craig Kaple

George Leach

ack W. Howath

Gary Noto

Rod Powell

Gary Sievert

Pelham Smith

Trevor Williamson

Mike Steindler

Pam Yokley

Mike Joyce

## PAPERBOARD DIVISION

MENASHA CORPORATION

June 13, 1995

Mr. Jack Horvath Hydro Chem Industrial Services, Inc. 6210 Rothway Ste. 150 Houston, TX 77040

Dear Mr. Horvath:

I spoke with you on the phone on June 13 regarding the chemical product Vertan. As a mentioned, we are asking for written verification that the product was not manufactured with PCB's and, to the best of your knowledge, does not (or did not) contain any PCB's. You verbally confirmed this for me and agreed to respond in writing provided we request so in writing.

We at Menasha thank you for your help in this regard. Please address your correspondence to Mr. Keith Kling, Environmental Manager, at the address below.

Sincerely,

Otsego Paperboard Division

Mike Schreiter Process Engineer

Mike Sr.

MS/alp



#DEFICITEY 800 TIC.

June 16, 1995

Keith Kling Menasha Corp. 320 N. Farmer Otsego, MI 49078-0155

RE: Sodium Silicate

Dear Mr. Kling:

To the best of our knowledge there are no PCB's in the Sodium Silicate that we have distributed to Menasha Corp.

If you need additional information, please feel free to contact me.

Sincerely,

Linda Mitchell

Safety & Compliance Manager

LM/m



June 15, 1995

Keith Kling Menasha Corp. Box 155 Otsego Mi. 49078

Sir:

This is in reference to your call concerning our product Big Tex.

Big Tex is a heavy duty liquid detergent. No Polychlorinated Biphenyl is used in the manufacture of this material. None of the ingredients are known or suspected of containing any trace of Polychlorinated Biphenyl..

I hope this information will prove sufficient for your purposes. Please feel free to have any government agency which you report to contact our firm should they need confirmation of this information.

Regards

George Zimmerman

Chemist, Technical Services

#### REPLY TO:

A Division of NCH Corporation

- P.O. Box 26911, Indianapolis, IN 46226-0911
- Suite 300, 1775 The Exchange, Atlanta, GA 30339-2061
- Mack II, Mack Centre Dr., 3rd Floor, S. Lobby, Paramus, NJ 07652-3905

Fax: (517) 627-8037

# **ENERCO CORPORATION**

WATER TREATMENT FOR CLEAN HEAT TRANSFER SURFACES 317 N. BRIDGE ST. • GRAND LEDGE, MICHIGAN 48837

June 30, 1995

Menasha Corporation Keith Kling 320 N. Farmer St. Otsego, MI 49078

Dear Mr. Kling:

This letter is in reply to a question you had about PCB in some product you need to dispose.

There were NO PCB's in the process of manufacturing Enerco 878, Enerco 803, Enerco 811, or Enerco 850.

If you have other questions feel free to contact us at 1-800-292-5908.

Sincerely

KO/jn

Wats: 800-292-5908

Office: (517) 627-8444



### ZEP MANUFACTURING COMPANY

1310 Seaboard Industrial Boulevard, N.W. Post Office Box 2015 Atlanta, Georgia 30301 (404) 352-1680

June 26, 1995

Menasha Corp. 320 North Farrel Street Otsego, MI 49078

Attn: Keith Kling

Mr. Kling:

This letter is to certify that the product Zep G-12B Granular Weed Killer does not contain residues of the chemical PCB.

If I may be of additional service in this matter, please contact me at Zep Technical Services, (404) 352-1680.

Sincerely:

Greg Bruce

Chemist, Technical Services



Diversey Corp. 12025 Tech Center Dr Livonia MI 48150-2193

Tel 313 458 5000 Fax 313 458 3800



Diversey Corp. 12025 Tech Cent MEN00888

12025 Tech Cent IVI LIVI
Livonia MI 48150-2 ...
Tel 313 458 2921
Tel 800 521 8140
FAX 313 458 2491
Beeper 800 946 4646 PIN 8015764

Norm Jepson Regulatory

June 16, 1995

Mike Schreiter Menasha Corp. 320 North Farmer Otsego, MI 49078

DuBois Product: C-1575A

Dear Mr. Schreiter,

We do not intentionally add or are not aware of any Polychlorinated Biphenyls (PCB) in our products or our raw materials.

Regulatory

313-458-2921

# **Facsimile Cover Sheet**

To:	KEITH KLING
Company:	MANASHA CORPORATION
City and State:	OTSEGO, MI
Phone:	
Fax:	616-692-2060
From:	HANK LIMPER
Company:	Houghton International
Phone:	610-666-4000
Fax:	610-666-1376
Date: Pages including this cover page:	AUGUST 1, 1995 0

### Comments:

Mr. Kling:

Based on a discussion I just had with a Mr. Jeff Woolstrum, I would like to inform you that we do not use PCB's in the manufacture of any of our Cosmoline products.

Sincerely,

Hank Limper Houghton International **Rust Preventives** 

# SODIUM CARBONATE ANALYSIS

**DOCUMENT #28** 



### HYDRO RESEARCH SERVICES

Nater Management Division Dow Corporation

MEN00891

Menasha Corporation 320 N. Farmer St. Otsego, MI 49078 Attn: Mr. Gary Roys

November 14, 1980

P.O. # 21212

Sample received 10-24-80

HYDRO NO: CUST, ID:	42944 Sodium Ca	rbonate
Solids, Total, %	99.9	9
Sodium Carbonate, mg/kg	945,000	2-5
Sodium, Na, mg/kg	500,000	* * .
Sulfur, S, mg/kg	14,200	
Phosphorus, Total, P, mg/kg	910	1911
iron, Fe, mg/kg	280	, <u>~</u> 5 °,
Barium, Ba, mg/kg	< 2	
Strontium, Sr, mg/kg	< 22	
Zinc, Zn, mg/kg	30	و المحور
Vanadium, V, mg/kg	< 6	
Nickel, Ni, mg/kg	21	
Aluminum, Al, mg/kg	270	1501
Lead, Pb, mg/kg	22	(6:21.
Potassium, K, mg/kg	18,000	1,500
Magnesium, Mg, mg/kg	1,100	, , ,
Calcium, Ca, mg/kg	2,300	5%
Manganese, Mn, mg/kg	340	وأحوي
Copper, Cu, mg/kg	6,6	, e e b 3/1-
Silicon, Si, mg/kg	< 56	
Titanium, Ti, mg/kg	< 56	
Chromium, Total, Cr, mg/kg	1.1	
Chloride, Cl, mg/kg	1,590	. ***.
Boron, B, mg/kg	< 100	

# HYDRO RESEARCH SERVICES Mater Management Division Corporation

MEN00892

November 14, 1980

Menasha Corporation 320 N. Farmer St. Otsego, M1 49078 Attn: Mr. Gary Roys

P.O. # 21212

Sample received 10-24-80

HYDRO NO: CUST. ID:	42944 Sodium Carbonate
Mercury, Hg, mg/kg	< 0.1
Cadmium, Cd, mg/kg	1.0
Arsenic, As, mg/kg	0.66
Thallium, Tl, mg/kg	< 2
Nitrogen, Kjeldahl, N, mg/kg	< 20
Sulfate, SO <sub>4</sub> , mg/kg	42,500
Insoluble matter, %	2.0
PCB, mg/kg	
reported as Aroclor 1242	< 0,1
'' 1254 '' 1260	
1200	< 0.1

Results reported on a dry weight basis at  $104^{\circ}$ C.

Linda Carey/Manager Analytical Services OTSEGO. MICHIGAN 49078 PHONE 616 692-6141 PURCHASE OF

No. 2121:

THIS NUMBER MUST
ON ALL PACKAGES
INVOICES AND
SPONDENCE.

VENDOR	SHIP TO	MEN00893
Clow Hydro Research Services 408 Auburn Ave.		MEMOOSS
Postiac, HI 48058		

STEELS FIGURES WHEILDID

					TICLES SUBJECT TO F THE REVERSE SIDE HE				
ORDER DATE MA		MATERIAL REQUIRED DATE		TERMS		CONFIRMING	SALES AND/OR USE TA		
	24/80		11/	15/80	Net 30	)	VERBAL	TAXABLE	_ EXEM
F.O.B.					SHIP VIA			REA INOUSTRIAL PR RESALE-LICENS	SON. OCESSING
ITEM	THAUC	ITY			DESCRIPTIO	N		UNIT PRICE	ITOTA
ITEM C	1 ATEREC D	QTY. REC	1) 23 45 56 78 9 10) 112) 13 14) 15) 16) 17 18) 19) 20) 21) 223) 24)	followin  Sodium Ca  Sodium Ca  Sodium  Sodium  Sodium  Phosphoru  Iron  Barium  Zinc dium  Zinc dium  Aluminum  Xickel  Potassium  Calcium  Hangaesium  Calcium  Calcium  Hangaesium  Calcium  Calcium  Hangaesium  Calcium  Cal	g: rbonate s	26) PCB 27) Sul	cury fates mium		\$38
				,		Date	<del></del>	Signed	

# PCB ANALYSIS OF FRESH WATER WELLS

**DOCUMENT #29** 



#### THE INSTITUTE OF PAPER CHEMISTRY

January 17, 1980

Post Office Box 1039 Appleton, Wisconsin 54912 Phone: 414/734-9251

Institute File No. 80-70037

Report to

**MEN00895** 

Dr. W. Allan Schenck Vice-President Technical and Environmental Affairs MENASHA CORPORATION P.O. Box 367 Neenah, WI 54956

Samples received on 1/9/80

POLYCHLORINATED BIPHENYL ANALYSIS

- Fort Billion

Polychlorinated Biphenyl,

Sample Identification

 $\mu g/1$ Interpreted as Interpreted as Interpreted as Aroclor 1242 Aroclor 1254 Aroclor 1260

Menasha Otsego 6-7 Wells, 1-4-80

 $< 0.1^{a}$ 

Menasha Otsego Well on 106th Street, 1-4-80

 $< 0.2^{b}$ 

bThis sample's chromatogram contained a few large peaks, but they were not PCB's.

Basis of Report: As received.

Method supplied by EPA, as noted in Federal Register 38(199), Part II:

28758-60 (Oct. 16, 1973), modified for use on pulp and paper mill

effluents.

Signed Sunght B. Dwight B. Easty

Group Leader

Analytical Group

Chemical Sciences Division

These tests are performed as a confidential service and | cannot be quoted without specific permission of The institute of Paper Chemistry.

<sup>&</sup>lt;sup>a</sup>No Aroclor pattern evident.

# PCB ANNUAL REPORTS

**DOCUMENT #30** 

memo

MENASHA CORPORATION

TO:

FORM HIS. 544

PCB File

John State Committee

DATE: 13 August 1981

FROM:

Mark Reed

SUBJECT: PCB Inventory

PCB Inventory as of 8/6/81

#### Transformers

Substation #1 1 - 1000 KVA with 192 gallons (2495 lbs.) Substation #2 1 - 750 KVA with 395 gallons (5200 lbs.) Substation #4 2 - 750 KVA with 175 gallons (4550 lbs.) Substation #6 1 - 1000 KVA with 146 gallons (1900 lbs.) Substation #8 1 - 500 KVA with 190 gallons (2185 lbs.)

#### Capacitors

Switchroom #1

2 - 300 KVAR @ 60 lbs. ea. = 180 lbs.

1 - 150 KVAR @ 30 lbs. = 30 lbs.

2 - 50 KVAR @ 10 lbs. ea. = 20 lbs.

Switchroom #9

2 - 150 KVAR @ 30 lbs. ea. = 60 lbs.

1 - 75 KVAR @ 20 lbs. = 20 lbs.

1 - 50 KVAR @ 16 lbs. = 16 lbs.

Primary Refiner Surge Packs

#1 Refiner >3 lbs.

#3 Refiner >3 lbs.

Total lbs. of PCB Oil 16,662

MR/kj

### PCB INSPECTION RECORD

	e of acitor	Location	Dat	te Inspected	Inspector	Comment
<u> </u>	201001	Hocación	1-24	ce inspected	0000	Comment
300	KVAR	Switchroom #	1	7-681	Whi Bone	of
300	KVAR	Switchroom #	1 ;	7. 6 91	Phi Bon	oh
150	KVAR	Switchroom #	ر ا	2 6.81	Phil Bon	Of
50	KVAR	Switchroom #	1 2	6.81	Phil Bom	ab
50	KVAR	Switchroom #	1 2.	-6-81	Phil Bone	ol
150	KVAR	Switchroom #	9 8	10/81	Wast Deal	oh
150	KVAR	Switchroom #	9 &	10/81	Mark T. Doch	ok
75	KVAR	Switchroom #	9 g	A/10/8/	Most Sach	oh
50	KVAR	Switchroom #	g g	1/10/21	Macht Seal	ok
1		#1 grinder	7	-6-81	Tor Van Moord	ck
1		#3 grinder	7-	6-81	Ron Van Moord	ok

	<u> </u>			
1	Substation #1	8/10/81	Mark Thed	ok
1	Substation #2	8/10/81	Mand Tolan	ok
1	Substation #4	8/10/81	Mark T Sed	ok
1	Substation #4	8/10/81	Mark T. Sal	ok
1	Substation #6	8/10/81	Mark I Soul	oh
1	Substation #8	13/01/3	Mark T. rich	ok

# Menasha Corp - Otses. Mill PCB INSPECTION RECORD

Size	e of		1	1	
, Capa	citor	Location	Date Inspected	Inspector	Comment
300	KVAR	Switchroom #	7-681	Phil Bons	of
300	KVAR	Switchroom #	7. 6. 81	Phi Bon	oh
150	KVAR	Switchroom #	1 2. 6.81	Phi Bon	of
50	KVAR	Switchroom #	1 2 6.81	Whi Bone	al
50	KVAR	Switchroom #	7 6-81	This Bow	de
150	KVAR	Switchroom #	8/10/81	Mark T Soul	oh
150	KVAR	Switchroom #	8/10/8/	Mark T. Soch	oh
75 ———	KVAR	Switchroom #	9 8/10/81	Mart Look	oh
50	KVAR	Switchroom #	9 8/10/81	Mark T Seal	ok .
1		#1 grinder	7-6-81	Low Van Moord	of romality MIR
1		#3 grinder	7-6-81	Ron Ven Your	of remark Inth

1	Substation #1	8/10/81	Mark Thed	ok
1	Substation #2	8/10/81	Mad Toled	ok
1	Substation #4	8/10/81	Must See	ok
1	Substation #4	8/10/81	Mark T. Sal	ok
1	Substation #6	8/10/81	Mark Ind	oh
1	Substation #8	8/10/81	Mand T. Loss	1 ok

### Mencisha Corp. Otsego Mill PCB INSPECTION RECORD

	e of acitor	Location	Date	Inspected	Inspector	Comment
300	KVAR	Switchcoom #1				
300	KVAR	Swatchroom #1		1		
150	KVAR	Switchroom #1				
50	KVAR	Switchroom #1				
50	KVAR	Switchroom #1				
150	KVAR	Switchroom #9				
150	KVAR	Switchroom #9				
75	KVAR	Switchroom #9				
50	KVAR	Switchroom #9				
1		#1 grinder				
1		#3 grinder				

1	Substation #1	11/ 9/81	MR	ok	
1	Substation #2	"/. 9	MIR	ok	
1	Substation #4	"/. 9	MIX	ok	
1	Substation #4	"/: Ŷ	MIR	oh	
1	Substation #6	11/8	MIR	ok	
1	Substation #8	11/1. 3	MIR	ok	



TO:

John Blauwkamp

DATE: 13 August 1981

SUBJECT:

PCB Capacitor Leak

FROM: Mark Reed

On August 8, 1981, the surge capacitor on No. 2 primary refiner went out and developed leaks which allowed the release of its' PCB oil. This leak was believed to be caused by a power upset in the electricity supplied by Consumers Power. I called A-l disposal of Plainwell, MI, they sent a man out and he cleaned up the oil. The capacitor along with the rags used to cleanup the oil and the clean up mans plastic suit were put inside a drum containing oildry. The remaining volume of the drum was then filled with oildry and the drum closed up. It is now in switchroom 4 waiting disposal. I was present during the entire cleanup of the capacitor and oil.

According to the EPA interm rules, we did not have to report the leak to them. Although less than an ounce of oil actually leaked out, the EPA classifies an incident such as ours, as a moderate leak and such a leak must be cleaned up and/or the unit replaced in 2 days. The time from the power upset to the clean up was less than 8 hours. Also, according to the interm rules a record of the incident must be made and kept for a period of 3 years, this report will serve as that record.

MR/kj

484-21



Reed

OTSEGO, MICHIGAN 49078 PHONE 616 692-6141 PURCHASE ORDER,

NO. 2456

THIS NUMBER MUST APPEAR
ON ALL PACKAGES, LISTS,
INVOICES, AND COMESSPONDENCE.

	40	1 Disp O Broa	d Stre	e t			٦	SHIP TO	)		MEN0	
	P1 E ENTER O	a1 awe1	), NI FOR THE F	49080				L		,		
RDER	DATE		L REQUIRED	DATE	TE	RMS			CONFIRMING	SALES AND/DR	USE TAX	STATUS
.0.8.	-6-81		8-5-8	1		net 30	<del></del>	<del></del>	ORDER	TAXABLE	EXEM EASON	P 74
										INDUSTRIAL RESALE-LICE	ROCESSIN HSE	G //
TEM	QUANT	TITY				DESCRIPT	ION			UNIT PRIC	TOT!	L PRÍC
			capac	itor.			FROM BA	PIII and			\$26	
ITEM	DATE REC D.	QTY. REC'D	DATE REC D.	QTY REC D	DATE REC D	QTY REC D						
•							Date			Signed		

# A-1 DISPOSAL CORPORATION

Commercial Pumping and Incineration Division PO Box 301 • 400 Broad Street • Plainwell, Mich. 49080

Specialist in Chemical and Hazardous Materials U S.E P.A.ID No. M.I.D. 059695452 I C.C. No. MC-148355

SOLD TO

WE SHE WAS A VIEW SOLD WATER PARTY A LINEAR 12[...

INVOICE

PROJECT

LOCATION

2.1

INVOICE DATE 1.7/31

INVOICE NUMBER

111 2

the above material has been received in satisfactory condition. PURCHASE ORDER NO. PROJECT NUMBER CUSTOMER NUMBER TERMS SALESMAN POR TACKAGINE 1. T 1 74,147 31750 -YS ITEM DESCRIPTION - MANIFEST NO. UNITE UNITS BILLED UNIT COST AMOUNT ATEL AND PROPAGE POR CAPACITY 1-10 10 155/11 PREIGHT . 33 . . \* TOTAL FOR INVOICE 140.00 MEN00903 FORM NO. 55%

# memo / CORPORATION

To: Tom Ray

DATE: 11 March 1983

**SUBJECT: PCB Annual Report** 

FROM: Dave Schweizer

Attached please find, four quarterly PCB inspection reports, a mill map identifying PCB transformer locations, and a copy of PCB leak memo of February 12, 1982.

I have recently assumed the position of Process Engineer and will be conducting future PCB inspections. Please direct future correspondence regarding this subject to me.

j

c PCB File

QUARTER 4 Th FROM MO. 8/82 TO 11/3 19 82

Substation		CERTAL NO	777.4		FLUID WT.	TYPE	LEAK	ING	
LOCATION		SERIAL NO.	KVA	GAL. FLUID	KG	FLUID	МО	YES	COMMENTS
l	GE.	H883017	1000	192	1,133	PYRANLL			
2	e [	C-863667	750	395	2,331	PYRANOL			
4	GE.	H887289 A	750	175	1,033	PYRANOL			
4	GE.	H 837289 3	250	175	1,033	PYRANUL	_/		
6	GE,	E 693916	1000	146	862	PYRANGL.			
8	W.	VBR 98611	500	190	992	INERTEEN			
		•							
<u> </u>	1		1	<u> </u>	L	<u> </u>	<u> </u>		<u> </u>

NSPECTOR M. REED DATE 11/3/82

3<sup>RD</sup> FROM MO. 5/82 TO 8/9 1982 QUARTER

Substation LOCATION		SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE	LEAK	ING	
Louilion		DERIAL NO.	KVK	GAL. FLUID	KG	FLUID	NO	YES	. COMMENTS
l	GE	H883017	1000	192	1,133	PYRANCI.	/		
2	€ <u>C</u>	C-863667	750	395	2,331	PURANOL	-		
4	GE,	H887287 A	750	175	1,033	PYRANUL	/		
4	GE.	H 887289 B	750	175	1,033	PYRANOL	/		
6	GE,	E 693916	1000	146	<u>8</u> ω2	PYRANCE.	/	ļ	
8	W.	VBR 98611	500	190	992	INERTEEN	/	<u> </u>	
		•					<u> </u>		
		······································							
L	1		<u> </u>	<u> </u>	<u>l </u>	<u></u>	<u></u>	<u></u>	<u> </u>

M. REED INSPECTOR

QUARTER 2 FROM MO. 2/82 TO 5/11 19 82

Substation LOCATION		SERIAL NO.	WILA		FLUID WT.	TYPE	LEAK	ING	
LOCALION		SERIAL NO.	KVA	GAL. FLUID	KG	FLUID	NO	YES	COMMENTS
l	GE	H\$83017	1000	192	1,133	PYRANUL	/		
2	E.E.	C-863667	750	395	2, 331	PYRANUL	. /		
4	GE.	H887287A	75c	175	1,033	PYRANUL			
4	GE.	H887289 B	750	175	1,033	PYRANOL.			
(0)	GE.	E 693916	1000	146	862	PYRANUL		<u> </u>	
8	W.	VBR 98611	500	190	992	INERTEEN			
		·							
L	<u> </u>		<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>		

QUARTER \_\_\_\_\_ FROM MO. 8/81 TO 2/11 19 82

Substation LOCATION		SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE FLUID	LEAK		. COMMENTS
			<u> </u>			THOID	NO	YES	
1	GE.	H883017	1000	192	1,133	Prrance.	/		
2	€ E	C-863667	750	395	2,331	FIRANOL			
4	GE.	H887281A	750	175	1,033	FYRANOL			MODERNE LEAK - LESSTHAN 2 PINT
4	GE.	H887289 B	750	175	1,033	PYRANUL			( See attached inema)
6	GE,		1000	146	862	PYRANCE.			
8	W.	VBR 98611	500	190	992	INERTEEN			
		1							
			1			1		1	
			1						
ļ			1						
<b></b>	1		1		<u> </u>				

TOR M. REED DATE 2/11/82

MEN0090

### Merasha Corp - Otsego Mill PCB INSPECTION RECORD

Size of Capacıtor	Location	Date Inspected	Inspector	Comment
300 KVAR	Switchroom #1			
300 KVAR	Switchroom #1			
150 KVAR	Switchroom #1			
50 KVAR	Switchroom #1			
50 KVAR	Switchroom #1			
150 KVAR	Switchroom #9			
150 KVAR	Switchroom #9			
75 KVAR	Switchroom #9			
50 KVAR	Switchroom #9			
1	#1 grınder			
1	#3 grinder			

#### Transformers

		<del></del>		<del></del>
1	Substation #1	2/11/82	MIR	01
1	Substation #2	2/11/82	MTK	Oh
1	Substation #4	2/11/83	MTL	ol
1	Substation #4	2/11/87	MY	drain Value
1	Substation #6	2116/87	MTR	de
1	Substation #8	2/11/80	MTK	of )

Cansed by purson who sampled dielectric fluid from transformer and didnot properly tryklen dringles, Gery light leak 5-C drips por min he, less than a la pint on the Cloor. To Chemers of RVC were contracted, RVG saw he already know about it and the persones who look the simple are coming back to tighten the persones who beak the simple are coming back to tighten the play and alcan of Low delines this as a moderate leak, does not have he be reported to EPA

# Menasha Corp - Otsigo M.71 PCB INSPECTION RECORD

Size	e of acitor	Location	Date	Inspected	Inspector	Comment
	KVAR	Switchroom #1		:		
300	KVAR	Switchroom #1			P	
150	KVAR	. Switchroom #1				
50	KVAR	Switchroom #1				
50	KVAR	Switchroom #1				
150	KVAR	Switchroom #9				
150	KVAR	Switchroom #9				
75	KVAR	Switchroom #9				
50	KVAR	Switchroom #9				
1		#1 grinder				
1		#3 grinder				

1	Substation #1	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	MIK	ok.
1	Substation #2	17.25	温坡	3/2
1	Substation #4	Sinha	MIK	A.
1	Substation #4	5/11/2	TITIK	ok.
1	Substation #6	3/11/53	MIK	and the second
1	Substation #8	of hilly in	作校	A

# Menasha Corp - Otseso Mill PCB INSPECTION RECORD

Size		l <u>.</u> 1				<b>1</b>
<u>apa</u>	citor	Location	Date	Inspected	Inspector	Comment
300	KVAR	Switchroom #1				
300	KVAR	Switchroom #1			•	
150	KVAR	· Switchroom #1				
50	KVAR	Switchroom #1				-
50	KVAR	Switchroom #1				
150	KVAR	Switchroom #9	· · · · · · · · · · · · · · · · · · ·			
150	KVAR	Switchroom #9				
75	KVAR	Switchroom #9				
50	KVAR	Switchroom #9				
1		#l grinder				
1		#3 grinder				<del></del>

1	Substation #1	8/9/82	MR	ok
1	Substation #2	8/9/82	MR	ok
1	Substation #4	8/9/82	MR	ok
1	Substation #4	8/9/82	MR	cork
1	Substation #6	8/9/82	MR	ok
1	Substation #8	8/9/82	MIR	ok

### Menasha Corp-Otseso Mill PCB INSPECTION RECORD

Size of Capacito	r Location	Date Inspected	Inspector	Comment
300 KVAR			2.1.5000001	Comment
300 KVAR				
150 KVAR	Switchroom #1			
50 KVAR	Switchroom #1			
50 KVAR	Switchroom #1	·		
150 KVAR	Switchroom #9			
150 KVAR	Switchroom #9			
75 KVAR	Switchroom #9			
50 KVAR	Switchroom #9			
1.	#l grinder			·
1	#3 grinder	•		

1	Substation #1	11/3/82	mn	ok	
1	Substation #2	11/3/82	MM	ok	
1	Substation #4	11/3/82	MIK	ok	
1	Substation #4	11/3/80	MR	ok	
1	Substation #6	11/3/80	MITL	d	
1	Substation #8	11/3/82	MIR	oh	

memo / CORPORATION

TO: John Blauwkamp

SUBJECT: PCB Leak

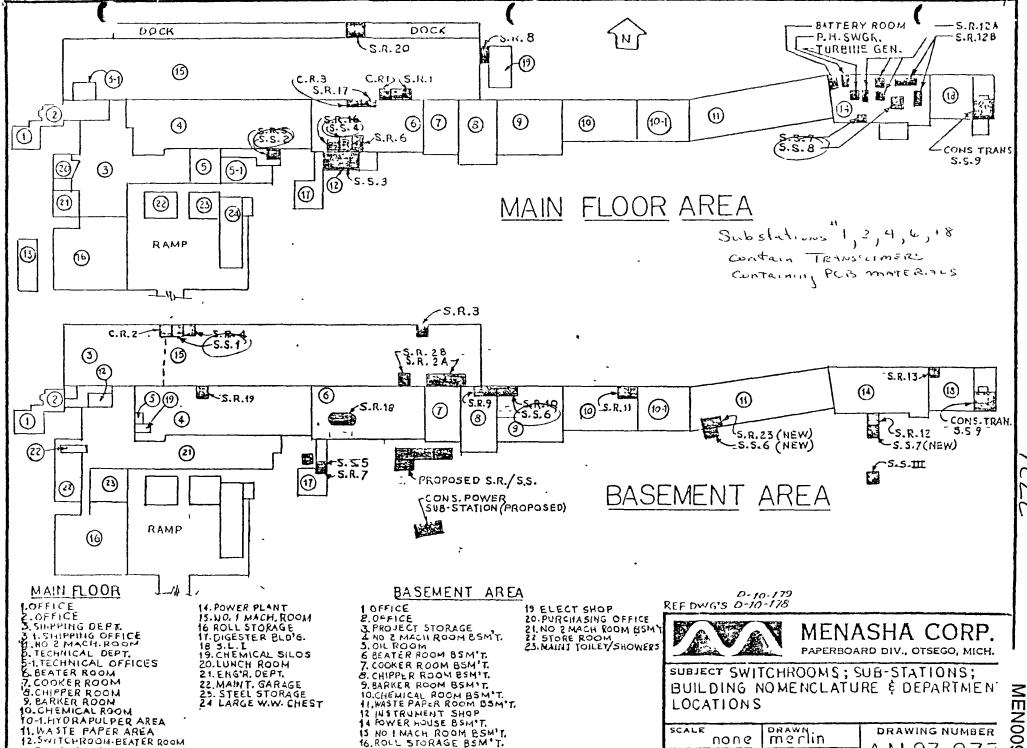
DATE: 12 February 1982

FROM: Mark Reed

On February 11, 1982, the 90 day PCB containing trasformer inspection was made. A leak on a 750 KVA transformer in substation 4 was dicovered, the leak was from a drain plug located at the bottom of the unit. Bob Gulbranson and Tom Clemmons (acting General Manager) were notified. On February 12, the leak had slowed considerably from 1-2 drops per minute to 1 drop per 5 minutes. A man from Rowen & Blair was called in and fixed the leak on 2/12/82 by tightening the drain plug and putting "more" vacuum in the transformer.

EPA defines a moderate leak as any leak where oil is running off the transformer boyd, in which the case above qualifies. A moderate leak must be repaired within two days of discovery and doesn't have to be reported to the EPA. The leak was repaired on 2/12/82.

MR/kj



17 P CESTEY BUM'T

SI IN ERS-TOILET

-L (14 x )

**MEN0091** 



TO: Mark Reed

DATE: March 4, 1983

SUBJECT: PCB Annual Report

FROM: Tom Ray

A review of your annual PCB inspection report indicates variations from regulation requirements. Please note the following and make the needed modifications to your forms, including past inspection years.

- 1. Identify specific transformers by serial number.
- Indicate total weight of PCB liquid/item in kilograms in transformers.
- 3. A mill map identifying PCB item locations.

TJR:sc

	e of acitor	Location	Date Inspected	Inspector	Comment
	KVAR	Switchroom #1			
300	KVAR	Switchroom #1			
150	KVAR	Switchroom #1			
50	KVAR	Switchroom #1			
50	KVAR	Switchroom #1			
150	KVAR	Switchroom #9			
150	KVAR	Switchroom #9			
75	KVAR	Switchroom #9			
50	KVAR	Switchroom #9			
1		#1 grinder			
1		#3 grinder			

#### Transformers

1	Substation #1	2/11/83	MTR	of
. 1	Substation #2	2/11/82	MIK	ok
1	Substation #4	2/11/10	MTIL	v2
1	Substation #4	2/11/82	MTh	small drip lack from
1	Substation #6	2/11/82	MTR	of
1	Substation #8	2/11/80	MIK	0/

Caused by person who sampled dielectric fluid from transformer and die not properly triphten drain plus, there light leak 5-6 drips per minite, less than a /a pint on the floor. To clomors of RVC were combacked, RVG said he already know about it and the personness who took the sample are coming back to tighten the plus and cloan-of low defines this as a moderate leak, is not have to be reported to EPA.

10 MIL 100.



TO: John Blauwkamp

PCB Leak

SUBJECT:

DATE: 12 February 1982

FROM: Mark Reed

On February 11, 1982, the 90 day PCB containing trasformer inspection was made. A leak on a 750 KVA transformer in substation 4 was dicovered, the leak was from a drain plug located at the bottom of the unit. Bob Gulbranson and Tom Clemmons (acting General Manager) were notified. On February 12, the leak had slowed considerably from 1-2 drops per minute to 1 drop per 5 minutes. A man from Rowen & Blair was called in and fixed the leak on 2/12/82 by tightening the drain plug and putting "more" vacuum in the transformer.

EPA defines a moderate leak as any leak where oil is running off the transformer boyd, in which the case above qualifies. A moderate leak must be repaired within two days of discovery and doesn't have to be reported to the EPA. The leak was repaired on 2/12/82.

MR/kj

### Menasha Corp - Otsego Mill PCB INSPECTION RECORD

	e of				1	
, apa	acitor	Location	Date	Inspected	Inspector	Comment
300	KVAR	Switchroom #1				
300	KVAR	Switchroom #1				
150	KVAR	Switchroom #1				
50	KVAR	Switchroom #1				
50	KVAR	Switchroom #1				
150	KVAR	Switchroom #9				
150	KVAR	Switchroom #9				
75	KVAR	Switchroom #9				
50	KVAR	Switchroom #9				
1		#l grinder				
1		#3 grinder				

1	Substation #1	5/1/82	MI	L
1	Substation #2	11/82</th <th>mith</th> <th>ok .</th>	mith	ok .
1	Substation #4	5/11/82	MIR	ok
1	Substation #4	5/11/80	mK	ok
1	Substation #6	5/11/82	MIR	ah
1	Substation #8	5/11/82	MATE	ck

# Menusha Corp - Otseso M. 11 PCB INSPECTION RECORD

Size	e of acitor	Location	Date	Inspected	Inspector	Comment
, cap.	101001	Bocacion	Date	111320000	1.05 0.001	Comment
300	KVAR	Switchroom #1				
300	KVAR	Switchroom #1				
150	KVAR	Switchroom #1				
50	KVAR	Switchroom #1				
50	KVAR	Switchroom #1				
150	KVAR	Switchroom #9				
150	KVAR	Switchroom #9		•		,
75	KVAR	Switchroom #9		•		
50	KVAR	Switchroom #9				
1		#l grinder				
1		#3 grinder				

1	Substation #1	8/9/82	MR	ok
1	Substation #2	8/9/82	me	ok.
1	Substation #4	8/9/82	MR	ok
1	Substation #4	8/9/82	MR	cok
1	Substation #6	8/9/82	MIR	ok
1	Substation #8	8/9/82	MIR	ok

### Menasha Corp-Otseso Mill PCB INSPECTION RECORD

	e of acitor	Location	Date	Inspected	Inspector	Comment
						Commente
300	KVAR	Switchroom #1				
300	KVAR	Switchroom #1			•	
150	KVAR	'Switchroom #1				
50	KVAR	Switchroom #1				
50	KVAR	Switchroom #1				
150	KVAR	Switchroom #9				
150	KVAR	Switchroom #9				
75	KVAR	Switchroom #9		,		
50	KVAR	Switchroom #9				
1		#1 grinder	-			
1		#3 grinder				

#### Transformers

1	Substation #1	11/3/82	MTR	ok
. 1	Substation #2	11/3/82	mm	ok
1	Substation #4	11/3/82	MIK	ok
1	Substation #4	11/3/80	MR	oh
1	Substation #6	11/3/80	MIL	d
1	Substation #8	11/3/82	MIR	od



memo / CORPORATION

TO:

Tom Ray

DATE: 20 June 84

SUBJECT:

PCB Annual Report

FROM: Gary Roys

Attached please find four quarterly PCB inspection reports and a copy of a map showing locations of PCB transformers. Also attached is a copy of the PCB oil leak memo of 27 October 83.

Enclosed also find a memo on the finding of two more transformers found to contain PCB oil. These are a 23 gallon Standard Transformer Company, serial number 56144, and a General Electric, serial number 6881373 which contains 9 gallons of oil. Both transformers' oil was tested and found to contain 78.4% and 300 ppm of PCB, respectively.

On 1 November 83, two drained transformers, General Electric, serial number C863667, and General Electric, serial number #693915, along with ten 55 gallon drums of PCB oil and one 55 gallon drum of rags and solid material were picked up for disposal. Final disposal letters were received January 84.

The two smaller transformers and two 55 gallon drums containing capacitors were picked up by A-l Disposal for transport for disposal June 84.

MENASHA COR  PAPERBOARD DI  PO BOX 155 · OTSEGO MICHIGAN A	IVISION
MESSAGE	REPLY
TO R. Gulbrauser	DATE 10-27-83
	Called REB @ 1130AM
DATE 14/27/83	this day Requested than to
- Diving the PCB inspection	replace leaking bone on
1) that sulvetation 2, it was	the would so Rose
blucerved that there is an	on to take core of publim.
apparant lead in one of the	eRVS
55 gallen dumo of Pyrand.	
This och was remined from transformer 6:8 C-863667	leaky torul into new
Please have material put into.	
	formel to their shop
	RVG
BY_ Sary Krip	SIGNED

RECIPIENT RETAIN WHITE COPY RETURN PINK COPY

TO:

Gary Roys ✓

DATE: 11-28-83

SUBJECT: Discovery of Another PCB Transformer

FROM: R. V. Gulbranson

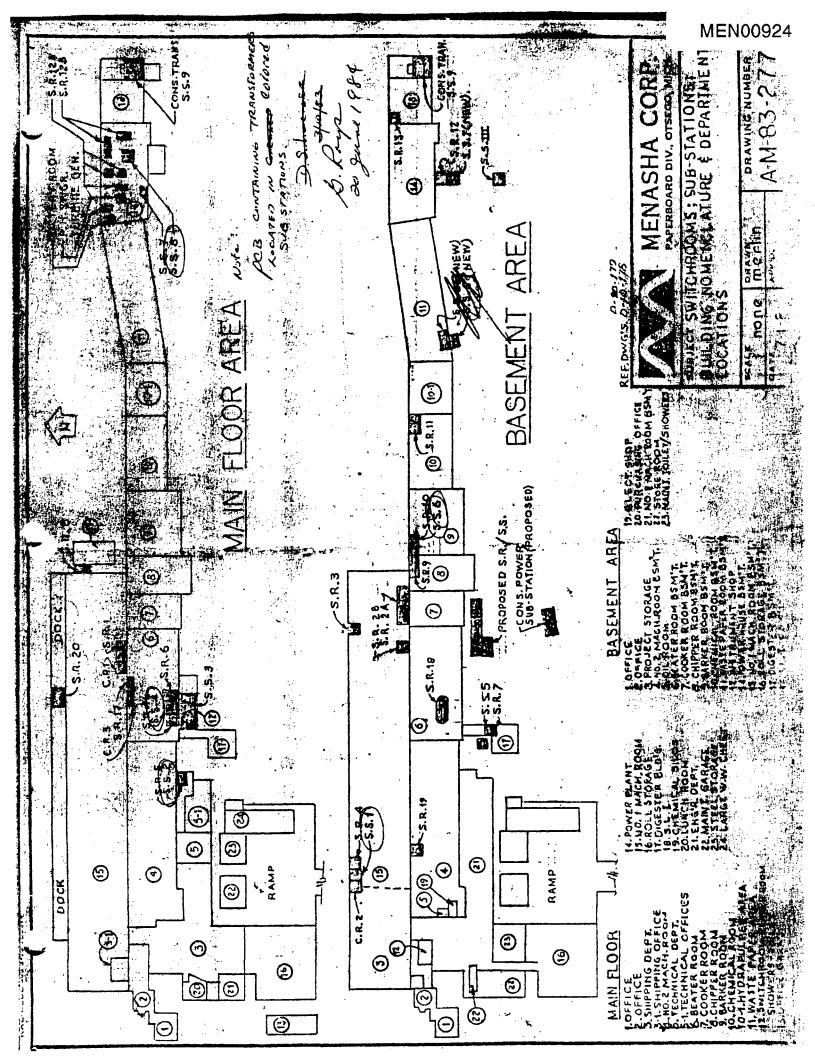
Assnt. Plant Eng. RVC

During the week of May 27, 1983 our Maintenance Electricians were removing some old switchgear from the area behind the elevator in the bale storage area. When they inspected the larger of the two single phase transformers they removed, they discovered it was a PCB containing unit. It was removed to the PCB containment area in switchroom #5. I was notified of this fact at a later date (after Labor Day shutdown). had fully intended to dispose of this unit as part of the 13.8 KV electrical project, but the paperwork had already been prepared, and I did not arrange for its disposal. It should now be disposed of as soon as that can be arranged.

Another transformer formerly located below the old wood room bus was put into switchroom #5 as a PCB contaminated unit on July 1, 1983. This unit should be tested and disposed of at the same time if it is indeed contaminated.

RVG/mm

Tom Ray T. E. Clemmons Ron VanNoord



QUARTER \_\_\_\_\_

FROM MO. 11/82 TO . 2/8/1983

Substation

CEDIAL NO	7774		FLUID WT.	TYPE	LEA	KING	
SERIAL NO.	KVA			FLUID	NO	YES	COMMENTS
GE 4883017	1000	1922495	1,133	PYRANCL	/		no apparent
GF C-863667	750	20 5	2 2 2 4 1	PYRANOL	/		leaks - no oil
GE. H887289 A	750	125 47	1 1 1 2 2	PYRANLL.	/	<u>   </u>	on surface o)
GE. 4887289B	750	125	1 21033	PYRAHOL	<u> </u>		10manut
GE. E693916	1000	1411	\$862	PyranoL	/	11	8 4
Westinhoise YBR 98611	500	190 2185*	1137	INERTEEN	/		
<u> </u>		İ			}		
	ر ا	•					
	1	<b>†</b>				1	
	GF C-863667 GE. H887289 A GE. H887289B	GE H 883017 /000 GF C-863667 750 GE. H887289 A 750 GE. H887289B 750 GE. E693916 /000 Westinghouse YBR 98611 500	GE H883017 1000 1922498  GF C-863667 750 375  GE. H887289 A 750 175  GE. H8872898 750 175  GE. E693916 1000 146  Westinghouse YBR 98611 500 19021854	GE H 883017 /000 /922495 1,133  GF C-863667 750 395 2,3\$1  GE. H887289 A 750 /75 2275 1,033  GE. H8872498 750 175 2275 21033  GE. E693916 /000 /46 1862  Westinghouse YBR 98611 500 /90 2185 1992	GE H 883017 /000 /922495 1,133 PYRANCL  GF C-863667 750 375 2,3\$1 PYRANCL  GE. H887289 A 750 175 1,033 PYRANCL  GE. H9872498 750 175 22758 1,033 PYRANCL  GE. E693916 /000 /46 19862 PYRANCL  Westinghouse VBR 98611 500 /9021854 1,124 INERTEEN	SERIAL NO.  KVA GAL. FLUID KG FLUID NO  GE # 883017 /000 /922495 1,133 PYRANCL  GF C-863667 750 37.5 2,3\$1 PYRANCL  GF. H887289 A 750 17.5 1,033 PYRANCL  GE. H987249B 750 17.5 22758 1,033 PYRANCL  GE. E693916 /000 /46 1862 PYRANCL  Westinghaise VBR 98611 500 /90 21854 1992 INERTEEN	GE #883017 /000 /92*498 1,133 PYRANCL / GF C-863667 750 395 2,3\$1 PYRANCL / GE, #887289 A 750 /75 22758 1,033 PYRANCL / GE, #987249B 750 175 22758 1,033 PYRANCL / GE, E693916 /000 /46 4862 PYRANCL / Westinghaise YBR 98611 500 /9021854 1,1221 INERTEEN /

N 7 263 A 6014

INSPECTOR

D. Shing M. Red

E8/8/5 STAD

1EN0092

3,

# 3707

# PCB TRANSFORMER QUARTERLY INSPECTION

QUARTER  $2^{ND}$  FROM MO. 2/83 TO 5/6 1983

Substation		CERTAT NO			FLUID WT.	TYPE	LEAK	ING	·
LOCATION		SERIAL NO.	KVA	GAL. FLUID	KG	FLUID	NO	YES	COMMENTS
l	GE.	H883017	1000	192	1,133	PYRANGL			
2	ତ.ଟ.	C-863667	750	395	2,331	PYRANOL	V		
4	GE.	H887289 A	750	175	1,033	PYRANOL	V		,
4	GE.	H887289 B	750	175	1,033	PYRANUL	V		
(o	GE.	E 693916	1000	146	862	PYRANOL.			Remove o from service on 413/83 -
8	W.	VBR 98611	500	190	992	INERTEEN	V		
		•							Pyrand stord in Stack dramy is
					•				in Substation # 6
									;
				, ,					,
4									

INSPECTOR Any &

DATE 5/6/83

QUARTER 3 FROM MO. 5/6 TO 8/4 1983

LOCATION	SERIAL NO.	70.4		FLUID WT.	TYPE	LEAK	ING	
LUCATION	SERIAL NO.	KVA	GAL. FLUID	KG	FLUID	NO	YES	COMMENTS
1	GE 4883017	1000	190	1,133	Fy12001	X		
.2	GE 6-863667	750	595	2.33/	Fuguel	X		
4	Ec 4887289A	750	175	1033	Pulanol	X		·
LJ	St H91/2898	750	175	1,033	Myanol	X		
8	W. VBR 98611	500	190	490	I ilei feell	X		
	·	•						
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	`	<u> </u>	<u> </u>				<u> </u>	

INSPECTOR

Hary Exays

DATE 8/4/8

MEN0092

QUARTER 4th FROM MO. 8/4 TO 10/27 19 63

LOCATION	CERTAL NO			FLUID WT.	TYPE	LRAN	CING	
LUCATION	SERIAL NO.	KVA	GAL. FLUID	KG	FLUID	NO	YES	• .
1	GE H883017	1000	192	1133	Fy19170/	X		
4	BEH887289A	150	115	1.033	Pyranol	. //		
4	BE 4887289K	150	175	1,033	Pugnol	X		
S	W. YOK 98611	500	190	990	Inertoer)	X		
						}		
	·							
L		⊥		<u> </u>	<u> </u>	<u> </u>	<u></u>	

NSPECTOR \_

Lary & Koys

Work	Order #	<del>;</del>	Product	Code	
WOLK	Orger #	;	Product	Code;	

Regional Drive, Box 1077 Concord, New Hampshire 03301 1-603-224-4006

### TRANSFORMER SERVICE (OHIO), INC.

#### TSI

#### **WASTE MANIFEST**

MEN00929

577 Kennedy Road P.O. Box 2144 Akron, Ohio 44309 216-784-4632

TYPE or PRINT clearly, Press Hard — Six Copies

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	PART A:										•				Do	cument	147	<del>-</del> -		4!	Ų
	NAME		SITE A	DDF	RE:	SS					PHON	IE#			E.P.A	\. ID # ① \$	TATE	(	) FE	DEP	IAI
	Generator: Menasha	Otsego			_					- 1				K	Ð						
	Corporation Responsible Individual:		rmer Str . MI 49												2				ī		
	Transporter:	İ												K	D						
	TRANSFORMER SERVICE	ret Street.	pol <sub>es</sub> ·							(216) 784-4632					178-HW						
œ	(OHIO), INC. Treatment/Storage or	Akron, Ohio	0 44309							<del></del>	1-216-37	6-24	2412			ШШ	Ш	Ц	丄	Ш	
GENERATOR	Disposal Facility: Transformer Service, (Ohio) Inc.		ennedy R							12	(216) 784-4632 (3)										
NE!	Selvice, (ville) The.	Akron, OH 44305							<u> </u>					)H-10b2171	3709	6	1				
5	PROPER US DOT	US DOT	UN	$\vdash$	Т	$\overline{}$	DRM L⊥		_	1	NTITY #		NIT 6		100	ONTAINERS	EDA	T		504	_
COMPLETED BY WASTE	SHIPPING NAME	HAZARD CLASS	NUMBER	Solid	Liauld	Trans- Former	Capac	Lamp Ballast	Other			Gallon	Cu. Yd	KGS	NO ON	Type — Drums, Trans. Etc.	EPA HAZ. CODE			STE COD	TY
λB C	①.  Rg. Polychlorinated Biphenyls	ОЯМ-Е	UN-2315		X					1	50	X				55 GAL DRUM	т	0	0	00	T
LETEC	<ul><li>③. Hazardous Waste, Empty; Last</li><li>☐ Contained PCBS, ORM-E, UN-2315</li></ul>	ORM-E	NA- <del>9</del> 189			X				47	04			X	2	TRANS	т	Ь	0	00	1
OMP	③.  □ Hazerdous Waste	ORM-E	NA-9189							RAG	-5				1	ORUM	Т	О	0	00	T
ς. C	<ul><li>⊙.</li><li>□ Solvent, N.O.S.</li></ul>	Combustible Liquid	NA-1993		X												1,7	$\Box$		0 1	†
	<b>⊙</b> .																		П		1
	①. PCB liquids and PCB contaminated liquids only. ②. Use for transformers only if drained or liquid. ③. Use for soil (in drums, transformers, etc.), Lamp Ballast, Capacitors, Rags, Gloves, etc.  TO BE STORED FOR ULTIMATE DISPOSAL.  BE INCINERATED AT ROLLINS ENVIRONMENTAL, DEER PARK, TX. SOLID Est. P.C.B. Actual Weight S TO BE BURIED AT CECOS, SCA, OR SIMILAR LANDFILL.										•				K	(gs (gs					
	GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. U.S. EPA, and the State. The wastes described above were consigned to the Transporter named. The Treatment, Storage or Diaposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so, I certify that the foregoing is true and correct to the																				
	best of my knowledge. GENERATOR'S SIGNATURE		TI	TLE							DATE SH	IIPPI	Đ			EXPECTI	D ARE	AVIF	L D	ATE	
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ATE OF MICHIGAN	Hov. Will net to a
WASTE SPOSAL MANIFEST Act 84 Waste (HAZARDC Act 138 Waste)	A Solver See MI 032913
Generalor's Name of the state o	Treatment, Storage or Disposal Facility Character Service
Site Address Transporters Address	Facility Address 13 11 11 11 11 11 11 11 11 11 11 11 11
320 M. Farmer St. 577 Kennedy Rd.	1550 Balmer Rd.
Change Mumber - A 19078 Mark Control of the Control	Phone Number
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Generatori Sit EPA ID Sumbrita District Constitution of the Consti	X X D C 4 9 8 3 6 6 7 9
If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:	E LES THE COMMISSION OF THE THE PARTY OF THE
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U.S. D.O.T. Shipping Name for common name if there is no D.O.T. Hazard Class U.N.N.A. No. Class	Total 5
O di shipping name) i i di shipping name) i i di shipping name) Code	No. Type 10 8 6 Weight or Volume Units Waste Number
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Include Safety precautions and special handling instructions	等的一种工作。 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Handle as per 40 CFR Part 761. Contain material and telephone 61	6/892-6141 at the state of the
(). Container type- These are 2 drained transformers.	The a man in the a the same of the world transport to him there to be a manifestation of the contract to the c
ENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and Generator S	ignature of the Property of the Chilipped in the Chilippe
belied and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the second seco	in state in the bound of the state of the st
information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest lay be used in administrative and court proceedings.	of Och amenday you
AULER'S CERTIFICATION:   certify acceptance of the above identified   Transporter   040027337696.   Transporter	Signature Date(s) Received
astes for transportation, I further certify that I shall deliver the hazardous vehicle I.D. No.  Subsequent  Subsequent	Bott His property of the fact the second
Initiality and court proceedings ( 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	transporter(s). signature(s).
the shipment cannot be delivered, describe the reasons for non-delivery.	We wise the strain or the recovery server de all hours of reserves
THE PROPERTY OF THE PROPERTY O	
	FPA 10 Number 1997   Helected 1   Market 1997
south any storificant discrepancies between modifies and shipment	
was a survey of the property o	Charge Assessed?

	WASTI STATE OF MICHIGAN	Act 64 Waste (HAZARD Act 136 Waste Other MI	ハマクロイで <b>(</b> - ***********************************
154	Generator's Name of Authorities and Special inches	Primary, Transporter's Name The American Manual Control of the Manual Treatment, Storage or Dispo	
ATION	Sile 1201 M. Farmer St. Miles 19078 110 110 110 110 110 110 110 110 110 11	Transporters Address 577 Kennedy Rd. Facility Address 2027 Battlegro	A STATE OF THE STA
	Phone Number 1111 4112 and barrons as faut in increase and as a converted to the base	Phone Number (216 ) 784-4632 more than the same hard the (713) 479-6001	international Service in the control of the contro
Q. A	M. T. D. O-36012405  a if more than one Transporter is to be utilized, give the Name and Transporter is to be utilized, give the Name and Transporter is to be utilized, give the Name and Transporter is to be utilized, give the Name and Transporter is to be utilized, give the Name and Transporter is to be utilized, give the Name and Transporter is to be utilized.	Transporter's EPA I.D. Number 1996 A.D. Number 1996 TX D 0 5 5 1 4 9 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	E 37 8
	2 JAZONZIO HO SPAROTZI THAMTADATO U.S. D.O.T. Shipping Name (or common name if there shipping name)	Is no D.O.T. Hazard Class U.N./N.A. No. Class No. Type 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Total Units Waste Number
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COMMENTS	Include Safety precautions and special handling instructions.  Handle as par 40CPR Part 761, Cor	tain material and telephone 616/692-6141	A composition of the second of
iat U.: Ini	ENERATOR CERTIFICATION: I certify that the above named materials belied and are in proper condition for transportation according to the app S. EPA. I further certify that the information contained on the manifest is formation requested by the manifest constitutes a violation of 1979 PA6 ay be used in administrative and court proceedings.	factual. I understand that the failure to accurately report all and/or 1969 PA136. I further understand that this manifest	Date Shipped MO. DAY! YEAR
W8 W8	AULER'S CERTIFICATION: I certify acceptance of the above identified astes for transportation. I further certify that I shall deliver the hazardous astes, together with this manifest, only to the destination specified by the presence on this manifests hunderstand that this manifest can be used in	Vehicle No. 1 D. No. Subsequent transporter(s) signature(s) Transporter	Date(s) Received
11	implairelye and court properdings the shipment cannot be delivered, describe the reasons for non-delivered, describe the reasons for non-delivered and delivered and deliv	Marie and the state of the stat	San San San San San San San San San San
wa fac	iDF CERTIFICATION: I certify receipt at this facility of the above identifustes. I also certify that the wastes were accompanied by a manifest properlity is the destination indicated on the manifest. I understand that this manifest is the destination indicated on the manifest.	erly certified by both the generator and hauler and that this  anifest can be used in administrative and court proceedings. Facility Site EPA I.D. Number	Accepted Date Received
	scribe any significant discrepancies between manifest and shipment,	num and the company Was a Surcharge Assessed?	Yes notification 93

CUSTOMER Menasha Corporation

LOCATION Otsego Mill

CUSTOMER RELEASE - PARTIAL/COMPLETE
SIGNATURE:

REMARKS: HAVE CUSTOMER SIGN AND DATE WHEN COMPLETED.

FOREMAN'S SIGNATURE:

MEN009

TRANSFORMER SERVICE, (OHIO) INC. 577 KENNEDY ROAD AKRON, OHIO 44305 (216) 784-4632

DATE <u>October 26, 1983</u>

TSI JOB NO. 4462-10.

JOB DESCRIPTION: . '

DISPOSAL OF TWO (2) PCB CONTAMINATED TRANSFORMERS.

SEE ATTACHED REMOVAL AND DISPOSAL REQUIREMENTS.

Need Michigan MAW.

TSI CANNOT BE HELD RESPONSIBLE FOR A SAMPLE LOCATION WHICH, AFTER SAMPLING, BEGINS TO LEAK.

EPA ID #0HD027337096

COMPANY			POLICY	Limits of Liabil		ds (000)
LETTER	- TYPE OF INSURANCE	POLICY NUMBER	EXPIRATION DATE	•	EACH OCCURRENCE	AGGREGATE
<b>4</b> .	GENERAL LIABILITY	:	1	BODILY INJURY	s	\$ .2
	COMPPEHENSIVE FORM PPEMISES—OPERATIONS		1/1/0/	PROPERTY DAMAGE	s	s
A	EXPLOSION AND COLLAPSE HAZARD UNDERGROUND HAZARD	MP-49816	1/1/84			
	PPODUCTS COMPLETED OPERATIONS HAZARD .  X CONTRACTUAL INSURANCE			BODILY INJURY AND	s 500	s 500
	RPOAD FORM PROPERTY			PROPERTY DAMAGE COMBINED	300	\$ 200
· · · · · · · · · · · · · · · · · · ·	X INDEPENDENT CONTRACTORS  PERSONAL INJURY			PERSONAL IN	JURY	\$
3	AUTOMOBILE LIABILITY			BODILY INJURY (EACH PERSON)	s	
	X COMPREHENSIVE FORM			BODILY INJURY (EACH ACCIDENT)	s	
.A ≎	X HIPTO	BAP-523419	1/1/84	PROPERTY DAMAGE	\$	
**	X NON OWNED			BODILY INJURY AND PROPERTY DAMAGE COMBINED	s 500	
\$	- EXCESS LIABILITY			BODILY INJURY AND		
≸ B	MBRELLA FORM	255C 0033448	1/1/84	PROPERTY DAMAGE	\$10,000	\$10,000
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7,	WORKERS' COMPENSATION	62 02133 83 9	1/1/84	STATUTORY		
A	and EMPLOYERS' LIABILITY	, 02 02133 03 7			s·100	TEACH ACCIDE?
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DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

edicated the Legisland of Legisland State of the State of States o

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 10 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER

Menasha Corporation Otsego Mill P.O. Box 155 Otsego, MI 49078 DATE ISSUED October 26, 1983

Mary a. Weakwell

AUTHORIZED REPRESENTATIVE

TO:

John Blauwkamp

May 7, 1985

PCB Annual Report - 1984

Gary Roys FROM:

Attached find four quarterly PCB inspection reports and a copy of a map showing locations of the PCB transformers.

Also, find monthly inspection reports of the 2 - 55 gallon PCB drums containing capacitors, and two transformer, Standard Transformer Company, serial number 56144, and a General Electric, serial number 6881373.

The above capacitors and transformers were disposed of in 1984. Find attached all manifests dealing with them.

On October 4, 1984, the Westinghouse transformer YBR 98611 was removed from service. Arrangements have been made for its disposal.

kј

ANA - QUAL, INC.
Subsidiary of A1 Disposal Corporation
P.O BOX 248/400 BROAD STREET
PLAINWELL, MICH. 49080

PHONE (616) 685-9514

Client: Menasha Corporation

P.O. Box 155

Otsego, MI 49078

Lab No: 2447-83
Date Received: 11/21/83

Date Reported: 12/6/83

Attn: Gary Roys

Sample #1 - A liquid sample identified as "PCB - 23 gallons."

Hransformer no. 57 c 54 luu

Test Results

PCB's (1260): 78.4%

Sample #2 - A liquid sample identified as "Sample from Transformer GE 68881373."

.7

Test Results

PCB's (1260): 300 mg/kg

Therley Sneek Shirley Green Laboratory Manager

SG/1dg

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This Sh	ippi	ng Order must be legibly illied in, in ink, in Indelible Pencil, or in Carbon, and retained by the Agent.				Shipper's No
Cox	ĭ.ñ.5	nolal Bemping & Lasingration, Division of Asi I	Although A	G.		Carrier's No
		(Name of Carrier)		<del> </del>	<del></del>	
ECEIVED, s	subject	to the classifications and tariffs in effect on the date of the issue of this Bill	of Lading Mena	isha C	orporat	ion/Otsego Mill
		ll អ៊ីខែមិៗរារា         June 1, 1984     គ	om 320 Far	mer S	treet,	Otsego, MI 49078
I said route to Iniform Dom pplicable mot Shipper h	estic States tor carri	below in apparent good order, except as noted (contents and condition of contents obeing understood throughout this contract as meaning any person or corporation in points own route, otherwise to deliver to another carrier on the route to said destination, it ation, and as to each party at any time interested in all or any of said property, that everaight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Clerclassification or tariff if this is a motor carrier shipment.  Exercises that he is familiar with all the terms and conditions of the said bill transportation of this shipment and the said terms and conditions are hereby agreed to by	safication in effect of lading including	omed herev on the date	thereof, if this	subject to all the terms and conditions of the sist a rail or rail-water shipment, or (2) in the classification of the classificatio
Consigned	d to _	American Industrial Waste				
•		Industrial Drive	(M			onsignee — For purposes of notification on a
) Pestinatio	_	White Bluff State TN Zip 37187 Cou	m.4	Deliv	ery	
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elivering	Carr	· · · · · · · · · · · · · · · · · · ·	or Vehicle Ini	tials	·····	No7.64
No Packages	нм	Kind of Packages Description of Articles Special Marks and Exceptions (If Hazardous Materials — Proper Shipping Name and Classification)	*WEIGHT (Subject to Correction)	Class or Rate	Check	Subject to Section of Conditions applicable bill of liding if this shipmer
2	x	Transformers: (RQ) Waste Polychlorinated (2-transformers/undrai	biphenyls		/UN2315	is to be delivered to the consumer with our recourse or the consumer the co- signor shall sign the following statemen the carrier shall not make delivery this shipment without payment of freigh- and all other lawful charges.
		Michigan Manifest # MI 0367397				(Signature of Consumor)
		NO TENNESSEE MANIFEST	Load time	in		If charges are to be prepaid write stamp here. To be Prepaid
			Load time	out		Received \$
			Unload tim	a in		Agent or Cashier
		PO #481184	Unload tin	e o		Per (The signature here technowledges on the amount prepaid)
weight. NOTE-W	here th	ives between two ports by a carner by water, the law requires that the bill of lading s e rate is dependent on value, shippers are required to state specifically in writing the d value of the property is hereby specifically stated by the shipper to be not exceeding				Charges Advanced
		per ed for this shipment conform to the specifications set forth in the box maker's certifi- ight Classification	cate thereon, and al	l other requ	uirements of	†Shipper's impoint in fieu of stamp in a part of Bill of Lading approved by if Interstate Commerce Commission
This is to ce regulations of	ertify th	tal the above-named materials are properly classified, described, packaged, marked authent of transportation  Placards examined and approved  Phipper, Per	Agent Of Mer and	must dei	ach and ret	r transportation according to the applicate ain this Shipping il Bill of Lading.
Permanent po	st-office	address of shipper A-1 PO	#8257	KI	<i>72-</i>	را ا

1983 - PRINTED IN U.S.A. BY
Wilson Jones Company
GRAYLINE FORM 44 301N 3 PART

### A-1 DISPOSAL CORPORATION

Commercial Pumping and Incineration Division
P.O. Box 248 • 400 Broad Street • Plainwell, MI 49080 • 616-685-9801

December 11, 1984

Mr. Gary Roys Menasha Corporation Otsego Mill PO Box 155/320 Farmer Street Otsego, MI 49078

Dear Mr. Roys:

Attached is a copy of a compliance certificate certifying proper disposal of your waste material. The certificate was issued by ENSCO for your records.

Do not hesitate to contact me if I can be of further assistance.

Sincerely,

Bonnie L. Rosenberg
Manifest Coordinator

BLR/cam

attachment

MEN00938

#### CERTIFICATION OF TRANSFORMER DECOMMISSIONING

•	A-1 Disposal Al Cooper Post Office Box 248			1		
L	Plainwell, MI 49080			٦		
ENSCO CERT	IFIES THAT AS OF THE	17th	_ DAY OF _		October	19
THETRANSFO	ORMERS RECEIVED FROM	A-1 D:	isposal,	Plainwell,	MI	
DESCRIBED (	ON ENSCO INVOICE NUMBE	R2:	1697	DATED	06/13/84	
ENSCO RECE	IVING REPORT NUMBER (DEL	LIVERY T	ICKET NUI	MBER)	1500113	<del></del>
AND MANIFE	ST NUMBERTN150011	3 & M	10367397,	AVE BEEN PRO	CESSED IN	ACCOF
DANCE WITH	RULES AND REGULATION	S AS ST	TATED IN	THE FEDERAL	REGISTER,	VOL. 44
NO 106 THUS	35DAY MAY 31 1979 PAGE 31	1546.47				

BY C	Lales L Robertson	180
NAME	Charles L. Robertson	
TITLE	Vice-President	
DATE	November 26, 1984	

		WASTE DISPOSAL MANUFEST			<del></del>						000700		
_		WASTE DISPOSAL MANIFEST		e (HAZARDOUS)	Act 136 \	Vaste					936739	11	
		Generator's Nameenable Corporation	Primary Transport	ers Name scl Corporation			Treatm	ent Sto	orage o	or Disp acust	osal Facility Trial Waste		
S	-	Site Address Ctsego Lill	Transporters Addi				Facility	y Addres				······	
ETES	ı	10 sor 155/320 Farmer Street		5/400 Broad Stre	et		Inc	ustr	ial	uri	Ve		
MA	NTIFICATION	Otsego, Nichigan 49078	Plainwell	, Michigan 4908	0		Wh:	ite E	luf:	E, T	ennessee 3	7137	1
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ATOR	Ž	, 616 , 692-6141 Cary Roys	, 616 , 685	-2301				5 , 79					
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		If more than one Transporter is to be utilized give the Name at	id EPA ID Numbe	er of each				•					
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-		shipping name)		DO 1 Hazard Glass		Code	No T	ype s	Liquid	Shud	Total leight or Volume	(circle one)	Waste Number
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	ENT	Is waste subject to Act 64 'SOLD FOR RECYCLE' exemp	ion? 🔲 YES	S 🚉 NO				** *					
İ	COMM	Contain material a telephone 615/691-6	141.										99
	8												<u>4</u>
-		ENERATOR CERTIFICATION 1 certify that the above named materials belied and are in proper condition for transportation according to the app			marked and }	nerator \$	Signature	ا مسم		٠,		MO	ate Shipped DAY YEAR
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		cormation requested by the manifest constitutes a violation of 1979 PA 6 is manifest may be used in administrative and court proceedings.	4 as amended and/	or 1969 PA 136 I further unde	erstand that	·~ /	· -	E.	1	· /**	derestana	2.0	4 1 6
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		nerator on this manifest. I understand that this manifest can be used	Cubcequent		, , Su		t transpo	orter(s)	signatu	ré(s)	/	12	i i i
	adr	ministrative and court proceedings	Vehicle I D N	os   , , , ,	1 3	Jeg.	4 L	My	N.K.	4/	· •		i Z
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_		t <sup>2</sup>										·	MEN 00936
TES		DF CERTIFICATION I certify receipt at this facility of the above identified by both the generator and hauler and that this facility is the											t proper 👸
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Menasha Corporation Site Address Otsego Mill	Transporters Add				Fac	cility Ac	dress	s			Laı v	vaste	· · · · · · · · · · · · · · · · · · ·	
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Phone Number , 616 , 692-6141 Gary Roys	Phone Number				Ph	one Nu	mber				··· • ·· · · ·			
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### A-1 DISPOSAL CORPORATION

Commercial Pumping and Incineration Division
P.O. Box 248 • 400 Broad Street • Plainwell, MI 49080 • 616-685-9801

December 18, 1984

Mr. Gary Roys Menasha Corporation Otsego Mill PO Box 155/320 Farmer Street Otsego, MI 49078

Dear Mr. Roys:

Attached is a copy of a compliance certificate certifying proper disposal of your waste material. The certificate was issued by ENSCO for your records.

Do not hesitate to contact me if I can be of further assistance.

Sincerely,

Bonnie L. Rosenberg Manifest Coordinator

BLR/cam

attachment

2684

1015 LOUISIANA

LITTLE ROCK, AR 72202

(501) 375-8444

### **CERTIFICATION OF COMPLIANCE AND DISPOSAL**

•	'
L	A-1 Disposal Al Cooper Post Office Box 248 Plainwell, MI 49080
ENSCO CERTIFIES	THAT AS OF THE 19th DAY OF November
19 <u>84</u> , ALL MAT	ERIAL RECEIVED FROM Menasha Corporation, Plainwell, MI
DESCRIBED ON EI	NSCO INVOICE NUMBER 21608 , DATED 06/08/84 ,
ENSCO RECEIVING	G REPORT NUMBER (DELIVERY TICKET NUMBER)1300466
AND MANIFEST N	IUMBER AR23462 & MI0367396 , WAS DISPOSED OF IN COMPLIANCE WITH
ALL LOCAL, STATI	E, AND FEDERAL LAWS AND REGULATIONS.
	ENSCO INCORPORATED  Wills L. Robertson  TITLE

															(			
,	WASTE DISPOSAL MANIFEST	Act 64 Was	te (HAZARDOUS)	☐ Act 136 V	Vaste	· · · · · ·	X Ot	ner(P	⊐ CB)	M		<u>]</u>	6	739	<u></u> ВБ			
	Generator's Name Menasha Corporation	Primary Transpo	rters Name osal Corporation				reatmer ENSC				ispos	al Fa	cility					
F 1	Sile Address Otsego Mill PO Box 155/320 Farmer Street	Transporters Add	dress 48/400 Broad Stre	eet			acility /			of th	h A	veni	ıe.					
COMPLE	Otsego, Michigan 49078	B	l, Michigan 4908			- 11	E1 Do							1730	)			
	Phone Number 616 692-6141 Gary Roys	Phone Number 616 685	-9801			F	hone N 501		2-1	.66	3							
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	If more than one Transporter is to be utilized give the Name	and EPA 10 Numb	er of each	<b>,</b>	· · · · · ·						- <del></del> -							
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- · ·	Include Safety precautions and special handling instructions						L			_1_	1_1			<u>l.i.</u>	yd	<u> </u>		1
COMMENT	Is waste subject to Act 64 SOLD FOR RECYCLE exem Contain material & telephone 616/692-6		S XX NO														7370	e E Z
lat US Inf	ENERATOR CERTIFICATION I certify that the above named material belied and are in proper condition for transportation according to the a SEPA I further certify that the information contained on the manifest formation requested by the manifest constitutes a violation of 1979 PA is manifest may be used in administrative and court proceedings.	pplicable regulation is factual I underst	s of the Department of Transp and that the failure to accurat	portation and lely report all	nerato	r gign	ature		K		η <del>Q</del>				MC	DAY	YE	<sup>₫</sup> :AR <b>~ ረ</b>
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¥0 11 1	the shipment cannot be delivered describe the reasons for non-de	Vehicle I D. I	vo s													.L1_		_
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]_				<b>,</b>	-		1 1.			! !	.	_ 🗆 #	Acce	pted 		ejected		4

WASTE DISPOSAL MANIFEST:    Confidence of the control of the contr	COMPLETES TRA	INSPORTER OMPLETES							GENE	RATOR	COMPLETES		
STE DISPOSAL MANIFEST:  Act 64 Wasse (HAZARDOUS STATES)  Proper 12 Act 64 Wasse (HAZARDOUS STATES)  Act 64 Wasse (HAZARDOUS STATES)  Proper 12 Act 64 Wass	Description of the second of t	wast wast gene	GEA labe U.S snfo	10-1-		WASTE I	<del></del>	<del></del>	7	DENTIFIC	CATION		_
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### STATE OF ARKANSAS

DEPARTMENT OF POLLUTION CONTROL & ECOLOGY PO BOX 9583 LITTLE ROCK ARKANSAS 72219 TELEPHONE (501) 562-7444

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MEN00946

DATE\_

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OMPANY							
DDRESS							
STATE.		ZIP		PHONE			
DESCRIPTION OF WASTES							
US DOT SHIPPING NAME			EPA CODE	QUANTITY IN POUNDS	CONT	AINERS Type	P opertie
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MEDIATE RESPONSE INFORMATION	PHONE				Placards	s affixed/Pr	ovided
	NATIONAL RESP	ONSE CENTER	1 800 424 8	802			
PECIAL HANDLING INSTRUCTIONS/GENERATOR/SHIPPER C	J OMMENTS						
ENERATOR S/SHIPPER S CERTIFICATION. This is to cere in proper condition for transportation according to the application Control & Ecology, and have been consigned to the light condition.	plicable regulation censed hazardous v	ns of the Depar waste transport	tment of Tr er named he	ansportation, the E erein on this date	PA, and the	Arkansas D	epartment
IGNATURE		IYPE NAME.			DA	ΓΕ	
RANSPORTER NO 1	PERMIT #			EPAID #	~ ,		<u> </u>
1PANY							· · · · · · · · · · · · · · · · · · ·
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iown in proper condition for shipment from the Generator/Sh		TYPE NAME.			DA	TE	
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\_TYPE NAME\_

2688

SIGNATURE\_

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#### STATE OF ARKANSAS

DEPARTMENT OF POLLUTION CONTROL & ECOLOGY PO BOX 9583 LITTLE ROCK, ARKANSAS 72219 TELEPHONE (501) 562-7444

### **HAZARDOUS WASTE MANIFEST**

AR- 23462

GENERATOR/SHIPPER	TYPE INFORMATION				<del></del>	
COMPANY				<u> </u>	75	
ADDRESS 10 Bar 105/170 Farmer Street						
CITYSTATE				E + 1 * fry +	. 1 ' !	
DESCRIPTION OF WASTES						
U.S. D.O.T. SHIPPING NAME	<del></del>	EPA	QUANTITY	CONT	AINERS	Hazardous Properties
US DUT SHIPPING NAME		CODE	IN POUNDS	No	Туре	(T) (C) (I) (F
(RQ) Waste Folychlorinated bipheryle (Small electric capacitors with		[C5]e	est, 960	2	01	4,0 1,
(T) TOXIC. (C) CORROSIVE. (I) IGNITABLE. OR (R) REACTIVE	· · · · · · · · · · · · · · · · · · ·				<u></u>	<del></del>
MMEDIATE RESPONSE INFORMATION	PHONE .17/6.13	C141		Placards	affixed/Pro	ovided
	NATIONAL RESPONSE CEN		8802			
PECIAL HANDLING INSTRUCTIONS/GENERATOR/SHIPPER C	]			Tire;		
Hattide purgitude to 60 GTF Part 7/1,  110 and control to come of tool consequences of the form ENERATOR'S/SHIPPER'S CERTIFICATION: This is to ce re in proper condition for transportation according to the ap	rtify that the above named m	epartment of T	ransportation, the	EPA, and the A	ed, marked Arkansas D	l and labele epartment o
ollution Control & Ecology, and have been consigned to the li	TYPE NA				ΓΕ <u></u>	
RANSPORTER NO. 1						
HANSPOHTER NO 1	PERMIT # 17 17 (Y	C 724)	EPAID #	<u> </u>	<u> </u>	
ANY A.1 Margari Cremaration						
ISS FOR STATE						
RANSPORTER CERTIFICATION: This is to certify that the nown in proper condition for shipment from the Generator/Sh		tination shown			TE	on the dat
RANSPORTER NO. 2	PERMIT #		50410 # 35	100000001	F 7	<del></del>
		1	EPA 1 U. #	111 / 12111 1 1 1 1		
OMPANY 1 Disposed Corporation  DDRESS 14: as 742/10 Broad Street						
ITY STATE		' ' DATE		BUONE : 1	~ 1, .	, ,
RANSPORTER CERTIFICATION: This is to certify that the cown in proper condition for shipment from the Generator/Sh	e transporter named above re	eceived the was	ste material in the	quantity descri	ibed hereor	on the dat
IGNATURE	TYPE NA	ME		DA1	re	
REATMENT/STORAGE/DISPOSAL FACILITY			EPA I.D. #	ndenendari (r	(+9,	
OMPANY FORTH					<del></del>	
DORESS 17th one C 1th Avenue	·····		<del> </del>		<del> </del>	
DDRESS 17th one C 1th Agains  ITY STATE  ACILITY CERTIFICATION: This is to certify that the wast acility is permitted to accept the waste under the terms of its	e material described below w current permits, and is accept	vas delivered by ed (subject to t	PHONE  the Transporter  he following discr	to this Facility epancies noted,	on this da if any).	ete; that the
IGNATURE	TYPE NA	AME		DAT	E	
LTERNATE TREATMENT STORAGE DISPOSAL FACILITY  ALTERDATE (SOU BEING 30 OTC.) 113						
<b>→</b> *SS						<del></del>
STATESTATE	e material described below w current permits, and is accepto	vas delivered by ed (subject to t	the Transporter the following discr	to this Facility epancies noted,	on this da if any),	ite; that thi
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1983 \* PRINTED IN U.S.A. BY
Wilson Jones Company
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RECEIVED, subject	to the classifications and tariff	s in effect on the date	of the issue of t	his Bill of Lading	Men	asha	Corpora	tion/Otg	ego	M111
at Dalling	# Company of	June 1.	1984	From 320	0 Fa	rmer	Street,	Otsego,	MI	49078
rm Domestic Strappicable motor carrie	i below, in appar at good order, ex- heing understood throughout this c- its own runti, otherwise to dilive r- ation, and as to each party at my tir- raight Bill of Lading set forth (1) in er classification or tarif if this is an extriber that he is familiar with the transportation of this shipment, and	Official, Southern, West of an orange of the control of the common of th	ern and Illinois Fre	eight Classification:	in effect includi	on the dai	te thereof, if the	is is a rail or rail-	water s	hipment, or (2
Consigned to _	ENSCO, Inc. 47th and Smith A	W07110	·-··		(A	Aail or stre	et address of c	onsignee — For p	ourpose	s of notification
Destination		State_AR	Zip 71730	County		D - 1				
<b>.</b> .				(★To be filled	in only w	vhen shipp	er desires and	governing tariffs	provide	for delivery t
Delivering Carri	erA-1 Disposal	Corporation		Car or Vehic		tials		N	o. <i>Te</i>	- 64
No Packages HM	Kind of Packages Description (If Hazardous Materials —	Proper Shipping Name a	nd Classification)	Correct	et to non)	Class or Rate		applicable bil	l of lad ered to	n 7 of Land ! ling, if this di the consum
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	Michigan Manifes	t #MI 036739	6	Load	tima	in		If charges stamp here	are to To be P	be prepaid v repaid.
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	PO #481184			Unioa	d tin	e out		Per(The signal the amount pr	ure her repaid)	e acknowledg
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greed or declared	value of the property is hereby spec	ifically stated by the ship	per to be not excee	ding	4 2			†Shippers im	Print I	n hou of stor
the Consolidated Frei					3	<b>;</b> ;		Interstate Cor	nmerce	Commission
asha Corpor	the above-named materials are perment of transportation attion/Otsego Mill	FIGURIUS CAG	Per	190 IF	ageha er agra	must de must sigi	etach and ret n the Origina	ain this Shipp of Bill of Ladi	ng,	we ap
			Generald	1 PO #825	_ , 🍑	77				

#### 501-863-7173



P.O. Box 1957 El Dorado, AR 71730

June 13, 1984

Menasha Corporation/Otsego Mill P.O. Box 155 Otsego, MI 49078

Attention: Mr. Gary E. Roys

Dear Mr. Roys:

Please find enclosed the Generator's Original Copy of the Arkansas Manifest No. AR-23462 along with accompanying Michigan Manifest No. MI-0367396 for your company's shipment of materials to Ensco, Inc., El Dorado, Arkansas, which arrived on site June 7, 1984.

Yours truly,

ENSCO, INC.

William M. Driskell,

Asst. Transportation Supervisor

WMD/sm

Enclosures



#### STATE OF ARKANSAS

DEPARTMENT OF POLLUTION CONTROL & ECOLOGY PO BOX 9583 LITTLE ROCK, ARKANSAS 72219 TELEPHONE (501) 562-7444

MEN00950

# OLIC WACTE BEABUTEOT

	JUS WAS IE		MILE2	)	<b>R-</b> 23	3462
GENERATOR/SHIPPER			EPAID. #_N	IID006012	405	
COMPANY Menasha Corporation/Otsego Mi	11					
ADDRESS PO Box 155/320 Farmer Street				<del></del>		
CITYOtsegoSTATE.	Michigan ZIP 4	9078	PHON	<sub>E</sub> 616/692-	-6141	
DESCRIPTION OF WASTES						
U.S. D.O.T. SHIPPING NAME		EPA CODE	QUANTITY IN POUNDS	CON No	TAINERS	Hazardous Propertiers (T) (C) (I) (R)
(RQ) Waste Polychlorinated biphenyls (Small electric capacitors with		PCB's	est. 960	2 .	01	T
*(T) TOXIC. (C) CORROSIVE. (I) IGNITABLE. OR (R) REACTIVE						
IMMEDIATE RESPONSE INFORMATION	PHONE 616/692-61	41		Placaro	is affixed/Pr	ovided
Cory Pous	NATIONAL RESPONSE CENTER	3 1-800-424-	8802	PCB		
Gary Roys	]			ГСВ		
SPECIAL HANDLING INSTRUCTIONS/GENERATOR/SHIPPER CO Handle pursuant to 40 CFR Part 761.	OMMERIO					
Dike and contain in case of leakage	or spill.					
GENERATOR'S/SHIPPER'S CERTIFICATION: This is to cel are in proper condition for transportation according to the ac Pollution Control & Ecology, and have been consigned to the li	plicable regulations of the Depa censed hazardous waste transpor	rtment of T ter named h	ransportation, the	EPA, and the	ged, marked Arkansas D	d and labeled epartment o
SIGNATURE Jary & Korp	TYPE NAME	GARY	E. Roy	SDA	TE 6	1189
TRANSPORTER NO 1	PERMIT # H-37 (PC	734)	EPA I.D. #M	ID0596954	52	
C PANY A-1 Disposal Corporation					<del> </del>	
ss PO Box 248/400 Broad Street						
CITY Plainwell STATE. TRANSPORTER CERTIFICATION: This is to certify that the shown in proper condition for shipmenty from the Generator/Sh	Michigan 719 4908 e transporter named above receinner for shipment to the destination	ived the wa	$\frac{6/1/84}{1000000000000000000000000000000000000$			
SIGNATURE BOOKS only	TYPE NAME	Dh.	les Ton	<u>e/</u>	ATE 06-	01-84
TRANSPORTER NO. 2	PERMIT #_ H-37 (PC	734)	EPAID.#_M	TD0596954	52	
COMPANY A-1 Disposal Corporation	PERMIT #		EPA ( U. #			
ADDRESS PO Box 248/400 Broad Street				<del></del>		
CITY Plainwell STATE TRANSPORTER CERTIFICATION: This is to certify that the shown in proper condition for shipment from the Generator/Sh		ived the wa		PHONE 61		
SIGNATURE Stow Wagner	TYPE NAME	_		<u> </u>	TE 6/	1/80
TREATMENT/STORAGE/DISPOSAL FACILITY			<del></del>	R00004041	CP	
COMPANY_ENSCO, Inc.			EPA I.U. #A		<u> </u>	
ADDRESS 47th and Smith Avenue						
	Arkansas zip 7	1730	PHONE	501/862-	1663	
FACILITY CERTIFICATION: This is to certify that the wast Facility is permitted to accept the waste under the terms of its or some second secon	e material described below was	delivered b (subject to	y the Transporter the following disc	to this Facilit repancies noted	y on this di I, if any).	ate; that this
SIGNATURE Mayoue G. Norces	TYPE NAME	MARJO	RIE G. DAVI	SDA	TE 6/7/	84
ALTERNATE TREATMENT STORAGE DISPOSAL FACILITY Alternate TSDF same as orginal	Generator		EPA I.D. #	<del></del>	. `	
COMPANY						
38						
CII. STATE  FACILITY CERTIFICATION: This is to certify that the wast  Facility is permitted to accept the waste under the terms of its	e material described below was	delivered by	PHONE y the Transporter the following discr	to this Facilit	y on this da , if any).	ate; that this
.71 (72	TYPE NAME				TE	
SIGNATURE	TIFE NAME					

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WASTE DISPOSAL MANIFEST		te (HAZARDOUS)	☐ Act 136 V	Vaste		Othe	er(]"	<u> (12</u>	M	<u> </u>	<b>b</b>	
Generators Name i.c.Lashu Corporation	Primary Transporter's Name  A-1 Disposal Corporation  Treatment Storage or Disposal Facility  ERSCU, inc.											
Sue Address Ottocgo 1311 10 box 155/320 Tarmer Street Ottocgo, Michigan 49078	Transporters Address PO Boz 248/400 Broad Street Flainwell, Eichigan 49080 Flainwell, Eichigan 49080 Flainwell, Eichigan 49080 Flainwell, Eichigan 49080 Flainwell, Eichigan 49080 Flainwell, Eichigan 49080 Flainwell, Eichigan 49080											
Phone Number C16 692-6141 Gary Roys	Phone Number   Phone Number   501 & 262-1663											
Generator's Site EPA ID Numberage visit and creeking the type of the I D B O 6 O 1 2 4 0 5 a theory and the type of the I D B O 6 O 1 2 4 0 5 a theory and the type of the I D B O 6 O 1 2 4 0 5 a theory and the type of the I I D I D I D I D I D I D I D I D I D		<u> </u>	क्रम्बर्धन ६० म्ब्र स्टब्स्ट्रिस्टिस्ट्रेस्ट्र	717 ili 70 '		ROO.	0.	0 0	.4	ord P. C.B. scr.	1 av 17,5 1	
	1		T	1	Cont	tainer	1	Forr		Τ	Ι <del>Τ</del>	Hazardou
U.S. D.O.T. Shipping Name (or common name if the shipping name).	re is no D.O.T.	D.O T. Hazard Class	UN./NA No	Haz. Class Code	No	Туре	ਚ		1 0	Total Weight or Volume	Units (circle one)	or Liquid Waste Number
(PQ) Waste Polychlorinated biphenyls (Small electric capacitors with		3-120	U:12315	1,2	13	DR	X			0 0 0 9 6 0	(1)	0,2,6
2											lb gal. yd	
3	1									51 11 1 1	ib gai yd ·	, 1111
4				1_1_							lb gal yd	
5				1							lb gal yd	·
6		,		,						· el elipsonia. International	, lb. gal yd	
Include Safety precautions and special handling instructions.  Is waste subject to Act 64 "SOLD FOR RECYCLE" exem  Contain material & telephone £16/692-6		s 宜 NO			-							2570
L.  ENERATOR CERTIFICATION: I certify that the above named material belied and are in proper condition for transportation according to the a S EPA I further certify that the information contained on the manifest information requested by the manifest constitutes a violation of 1979 PA his manifest may be used in administrative and court proceedings.	pplicable regulation Lis factual Lundersi	s of the Department of Trans and that the failure to accura	portation and tely report all	erator :		ure (	Januari Sarahari Sarahari	~. 			MO	ate Shipped DAY YEA
AULER'S CERTIFICATION: I certify acceptance of the above identi- asies for transportation. I further certify that I shall deliver the hazard asies together with this manifest only to the destination specified by enerator on this manifest. I understand that this manifest can be used diministrative and court proceedings.	the Supposement		C Sul	nsporte	·		(5) SI	gnat	ure(s			<del></del> 1
the shipment cannot be delivered, describe the reasons for non-de	ntified wastes and t	hat this facility is licensed to	accept those was	tes. I als							a manife	
ertified by both the generator and hauler and that this facility is the escribe any significant discrepancies between manifest and shipmer		ited on the manifest. I und	TSI	nanifest OF Sign	ature		in a				Dai	e Received
······································	¥		Fact	inty Site	EPA	I.D. NL	ımbe	r		B Accepted	-	6 0 7 1

# PCB TRANSFORMER QUARTERLY

QUARTER	FROM MO.	то		19
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LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE	LEAR	CING	
LOCALION	DERCEAL NO.	RVA	GAL. FLUID	KG	FLUID	МО	YES	COMMENTS
SR5	STC 56144		23		Pyrano 1	~		1/9/84 Chechel GPR
SRS	GE 6881373		9			V		
Ses_	2-55gal drum- capaci	iors				V		
SR5	STC 56144		23		Pyranol			2/7/84 checked BER
SR5	68 6881373		9		1	V		
SRS	2.55 gal drums -eap	aethor.	\$			1		
SRS	ST-C Condu		2 2		12 1	L-		2/8/84 Churk.cl 2/1
SK5	577 56144 52 6881313		7		tyrano)	b-		=/8/0 F Cauran 47
SRS	2-55 gald 14100	Neces	1/160			1		<u> </u>

EN00952

QUARTER \_\_\_\_\_ FROM MO. \_\_\_\_ TO \_\_\_ 19\_\_\_

LOCATION	SERIAL NO.	TAL NO. KVA GAL. FLUID FLUID WT. TYPE		LEA	KING			
LUCATION	SERIAL NO.	AVA	GAL. FLUID	KG	FLUID	NO	YES	. COMMENTS
5K5	STC 56144		23		1-1-11-11	v ·		41 19 LS4 Philled CEX
3/65	64 6881373		Í		7	٠,		","
1/5	2.55. N. Anima 34.4	111/40.2				1-	<u></u>	
SRS	STC 56144		23		Ryrand	/		5/14/84 Checkel 641
	GE 6881373		9		<u> </u>	/		
SR5	2-55 gallen drun	06	p		<u> </u>	V		
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INSPECTOR Hiery & They DATE

MEN00953

QUARTER 4th FROM MO. 8/84/ TO 1984

LEAKING FLUID WT. TYPE LOCATION SERIAL NO. GAL. FLUID KVA COMMENTS FLUID NO YES Pyrano H883017 1000 1033 Puraro H887289A 750 Pyrano 992 REMOVE FROM SEKUICE YBR 9861 500 90 NERTEEN Stormas

INSPECTOR Lary 6. Rop

DATE 10/10/84

QUARTER  $\frac{3^{RD}}{}$  FROM MO.  $\frac{5/84}{}$  TO  $\frac{8/84}{}$  1954

LEAKING FLUID WT. TYPE LOCATION SERIAL NO. GAL. FLUID COMMENTS KG FLUID NO YES H883017 1133 Pirane SUB 1 192 1000 175 H887289A 750 Pirano 1033 ·V 175 Pyran H887289B 750 1033 4 BR 98611 500 1990 992 Inerteen

inspector <u>Lak</u>

Hary & Roys

DATE 8/14/84

6590

QUARTER \_\_\_/57 FROM MO. \_///83 TO \_2/78 19.84

substation

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE	LEAK	CING		
LUCKITON	DEMIAL NO.	AVA	GAL. FLUID	KG	FLUID	NO	YES	. COMMENTS	
	6E H883017	1000	192	1133	Pyranol	V		_	
sub 4	GE H887289A	750	175	1033	Pyranol	V			
sub4	62 H887289B.	750	175	1033	Pyrano/	/			
<i>5468</i>	W YBR 98611	500	190	992	Inerteen	1			
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INSPECTOR Day & Koys

DATE 2/7/84

QUARTER  $\frac{2^{n0}}{\sqrt{284}}$  FROM MO.  $\frac{2/84}{\sqrt{105/84}}$  TO  $\frac{5/84}{\sqrt{1984}}$ 

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE	LEAK	ING	2010
200201			GALL. PLUID	KG	FLUID	NO	YES	. COMMENTS
SUB /	GE 4883017	1000	192	1/33	Pyranol	V		
5UB 4	62 H887289A	750	175	1033	Rymnol	V		
I	B41 H 887289B.	1750	175	1033	Puranol	V		
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INSPECTOR Sary & Koys

DATE 5/14/84

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memo / CORPORATIO

TO:

PCB File

DATE: 11 April 1984

SUBJECT: April 10th conversation with Al Cooper

of A-1 Disposal

FROM: John Blauwkamp

On April 10, I talked with Al Cooper regarding the disposal of some PCB capacitors and transformer that we have in storage. We contacted A-I in December of last year and A-I was supposted to have picked up capacitors and transformer before the end of 1983. I asked Al what the limit was on the time we could legally store the capacitors and transformer at our location. Al said we could keep them on site for up to a year from the time they were put in storage. He assured that they would be able to ship them out long before the storage time expired.

Gary Roys

j

#### A-1 DISPOSAL CORPORATION

Commercial Pumping and Incineration Division
P.O. Box 248 ● 400 Broad Street ● Plainwell, MI 49080 ● 616-685-9801

January 19, 1984

Mr. Gary Roys Menasha Paper Corporation 320 N. Farmer Street Otsego, MI 49078

> Re: PCB Material A-1 Quote #83-018

Dear Mr. Roys:

This letter is to confirm a quotation given to you by telephone for the disposal of your PCB capacitors and transformers.

A-l Disposal will remove and transport for disposal the following items:

1.	Transformer #STC56144	\$1,060.00
2.	Transformer #GE68881373	836.00
3.	2 drums of Capacitors	1,404.00

Total - \$3,300.00

This price includes all transportation and disposal costs and  $1\frac{1}{2}$  hours each for loading and unloading. Loading and unloading time in excess of  $1\frac{1}{2}$  hours will be billed at a rate of \$32.50 per hour or fraction thereof.

If there are any further questions, please contact me.

Sincerely,

Allen C. Cooper

Industrial Sales Manager

Ellen & Cooper

ACC/1dg

memo CORPORATION

Note to Files

DATE: October 8, 1984

SUBJECT: Power House Transformer - YBR 98611 FROM: Gary Roys

MEN00960

GEL

On 4 October 1984, the Westinghouse transformer YBR 98611 was removed from service, and taken to

a enclosed storage area.

cc: J. Blauwkamp

kј



₩ ГО:

John Blauwkamp/

DATE: January 28, 1986

SUBJECT: PCB Annual Report - 1985

FROM: Gary Roys

Attached find our quarterly PCB inspection reports and a copy of a map showing locations of the PCB transformers.

On December 1, 1985, a new set of PCB regulations went into effect. The parts that effect us are in compliance. These are (1) clearly marking the transformers and access doors, (2) notify local fire department and our fire brigade as to their location, and (3) keep flammable material 16 ft away from the vaults containing the units - (See also R.V. Gulbranson's memos.)

The Westinghouse transformer YBR 98611 was disposed of in June 1985. Attached find all manifests dealing with the above transformers.

cc: Mark Reed

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QUARTER 15T FROM MO. Nov to 71b 1985

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE	LEAK	CING	
noun row	DUKTAL NO.	KVK	OAL. PLUID	, KG	FLUID	NO	YES	. COMMENTS
SUBI	H883017	1000	192	1133	Pyranol	V		
SuB4	H 887289A	750	175	1033	Pyranol	· /		
SuB4	H887289B	750	175	1033	Pyranol	V		
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Storace	YBR 98611	500	190	992	Inerteen	V		
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INSPECTOR Law & Koys

DATE 2/11/85

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QUARTER 2 10 FROM MO. 726 85 TO May 8519 85

LEAKING FLUID WT. TYPE SERIAL NO. LOCATION GAL. FLUID COMMENTS FLUID YES NO Pyranol H883017 1133 SUB 1 1000 192 H 887289A 175 1033 SuB 4 Pyrano 750 H 887289B Pyrano 175 1033 750 992 190 YBR 98611 500 Inerteen Storage MEN00963

QUARTER 3 RD FROM MO. 5/85 TO 8/85 1985

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT. KG	TYPE FLUID	LEAF NO	YES	. COMMENTS
54B1	H883017	1000	192	1133	Pyranol	1		
SUB4	H887289A	750	175	1033	Pyranol	V		
SUB4	H887289B	750	175	1033	Pyrano	V		
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INSPECTOR Lary & Horse

DATE 8/21/85

QUARTER 4th FROM MO. 8/85 TO 11/85 1985

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE FLUID		KING	. COMMENTS
					<u> </u>	NO	YES	
SUB	, H883017	1000	192	1133	Pyranol	V	<u> </u>	
SyB4	H887289A	750	175	1033	Pyranol	V		, ,
SUBY	H887289B	750	175	1033	Pyranol			
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INSPECTOR \_

Jary E. Koge

DATE 11/18/85

2665

memo CORPORATION

\_\_\_ TO:

DATE:

PCB File

May 6, 1986

SUBJECT:

FROM:

PCB inventory as of 12/31/85

Gary Roys

GOL.

#### TRANSFORMERS

Substation #1 1 - 1000 KVA with 192 gallons (2495 lbs). Substation #4 2 - 750 KVA with 175 gallons (5200 lbs).

#### CAPACITORS

Switchroom #1

2 - 300 KVAR @ 60 lbs. ea. = 180 lbs. 1 - 150 KVAR @ 30 lbs. = 30 lbs. 2 - 50 KVAR @ 10 lbs. ea. = 20 lbs.

cc: J. Blauwkamp

k j

~ / / M

#### DNR D MICHIGAN DEPARTMENT OF NATURAL RESOURCES

EPA 45-00 270 3-02 (8-34)

DO NOT WRITE IN THIS SPACE

1979, a 1969. Failure MEN00967

Failure Section Act 135, P.A. 1969.

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Pri 51. Rev. 7:0-

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EPA Form £700-22 (3-84)

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PR 511 Rev. 7/84

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#### DNR D MICHIGAN DEPARTMENT OF NATURAL RESOURCES

MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICH 1-800-292-4706 OR OUT OF STATE AT \$17-373-7660 AND THE NATIONAL RESPONSE 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (3-8-)

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PR 5119 Rev. 7/84

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Iontact: Lynn Jensen Contact: Al Cooper Customer Number: ADOSO Invoice Date: Cell-85  Date Transformer(s) Received: 5-30-85 Invoice Number: 266  Manifest Number: MT. 606,249 Certification Number: ITDC:1205  TRANSFORMER ORAIN & FLUSH TIEM NUMBER COMPLETED DATE REPORT NO. LANDFILL DATE NUMBER    C-24-85   G G8	tomer Name: <u>A</u>	-1 Menashua	. Corp. Rec	eiving Report Numb	per: 15-00942
Iontact: Lynn Jensen Contact: Al Cooper Customer Number: ADOSO Invoice Date: Cell-85  Date Transformer(s) Received: 5-30-85 Invoice Number: 266  Manifest Number: MT. 606,249 Certification Number: ITDC:1205  TRANSFORMER ORAIN & FLUSH TIEM NUMBER COMPLETED DATE REPORT NO. LANDFILL DATE NUMBER    C-24-85   G G8	/Address: Mena	xshua mI.	V Cer	tification Address	s: P.O. Box 248
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			Approved	d By: <u>P.C.</u>	Date: 1c-21c-85
1660	# Non-Transformer	Containers:			2669



CERTIFICATION OF TRANSFORMER DECOMMISSIONING

г			٦		
	A-1 Disposal Company Al Cooper				
	Post Office Box 248				
	Plainwell, MI 49080				
L			7		
		24th		June	85
ENSCO CERT	IFIES THAT AS OF THE	DAY OF	· · · · · · · · · · · · · · · · · · ·		_, 19
THE TRANSCO	ORMERS RECEIVED FROM _	Menashua Corpo	-	enashua,	MI
INE INANSE	JAMENS RECEIVED FROM _				
DESCRIBED (	ON ENSCO INVOICE NUMBE	ER	DATED 11/	/85	
ENSCO RECE	IVING REPORT NUMBER (DE	ELIVERY TICKET NUI	MBER)	1500942	
AND MANIFE	EST NUMBERTN150094	2 & MI606249	HAVE	BEEN PRO	CESSED IN
4.CCOBD4N	CE WITH RULES AND REG	TE SA SHOITA ILLE	ATED IN THE	EEDERAL	DECISTED
ACCORDAN	CE WITH NUCES AND REC	SOLATIONS AS STA	ALED IN THE	FEDERAL	nedio i en,
VOL. 44, NO.	106, THURSDAY MAY 31,	1979, PAGE 31546-	47.		

	ENSCO INCORPORATED
вч	
NAME	Fredric M. Schwartz
TITLE	Vice-President/Sales and Marketing
DATE	July 12, 1985

#### A-1 DISPOSAL CORPORATION

Commercial Pumping and Incineration Division
P.O. Box 248 • 400 Broad Street • Plainwell, MI 49080 • 616-685-9801

July 26, 1985

Mr. Bob Galbranson Menasha Corporation PO Box 155 Otsego, MI 49078

Dear Mr. Galbranson:

Attached is a copy of a certification of transformer decommissioning certifying the proper processing and disposal of your PCB transformer.

Do not hesitate to contact me if I can be of further assistance.

Sincerely,

Bonnie L. Rosenberg Manifest Coordinator

Branie & Rosenberg

BLR/rlb

enclosures

July 12, 1985

Al Cooper
A-1 Disposal Company
Post Office Box 248
Plainwell, MI 49080

#### NOTICE

Enclosed is a Certification of Transformer Decommissioning, signed by an ENSCO Corporate Officer, certifying the proper processing and disposal of your PCB transformers.

Thank you for your confidence in ENSCO. We appreciate the opportunity to provide complete PCB services to A-1 Disposal Company.

ENSCO also provides hazardous waste services for RCRA waste materials. For more information or answers to questions, please call your ENSCO representative or David Harsh, Supervisor/Sales Administration.

6 ER

memo CORPORATION

**O**:

All Mill Personnel

DATE: 11-25-85

SUBJECT: New PCB Regulations

FROM: R. V. Gulbranson / RVG

On December 1, 1985 a new set of PCB regulations will go into effect. These new laws apply to Menasha Corporation-Otsego because we still have three PCB-containing transformers in the mill. The law does not require us to replace these units, (we have included a budget request to do so in the 1986 budget) but it does require we clearly mark the transformers and the access doors to where they are located, notify the local fire department and our own fire brigade as to their location, and keep flammable material 16 feet away from the vaults containing these units.

It is this third part that we need your help in enforcing. You will notice new warning signs posted by Sub #4A and #4B in the primary refiner room, and Sub #1 in the #1 paper machine dry end basement. These areas must be kept free of combustibles. This is not a suggestion. This is the law! Although this may be a change from the norm or it might even be an inconvenience, it must be complied with.

Thank you in advance for your complete cooperation on this matter.

m



## MENASHA CORPORATION

November 1, 1985

Fire Chief Otsego Fire Department Otsego, MI 49078

Re: Location of PCB Transformers in this facility

Dear Sir,

The EPA has published the final ruling in the Federal Register (40CFR 761, 50FR 29170) on July 17, 1985 with regard to disposition of PCB's in electrical transformers.

Our long term goal is to dispose of the three PCB transformers we have left. However, until we do that, the law requires that we register our PCB transformers with our local fire response personnel, and furnish them with location, access point, size etc. So, please find enclosed two copies of a mill plot plan showing where the three PCB units are.

If there is other information you need, or if you wish to see these personally, please contact me by phone at the number below.

Sincerely,

MENASHA CORPORATION

R. V. Gulbranson

Asst. Plant Engineer

bert V. Xhelbranson

memo / COHHUMAIIUIV

Jake Richardson

DATE: 11-4-85

SUBJECT: PCB Transformers

FROM: R. V. Gulbranson Asst. Plant Engineer

I recently sent you a copy of a letter where we notified the Local Fire Department of the location of our three remaining PCB transformers. I have included a copy of the mill plot plan showing the actual location of these units. I would ask that you and your fire brigade be aware of the location of these transformers and the precautions to be taken should a fire occur in one of their locations.

I will be writing a work order to install PCB warning labels on all access doors to the rooms containing the PCB transformers and marking the floors 16 feet from the vaults to keep combustibles out of the area. Both of these actions are to provide for compliance with the new PCB laws effective December 1, 1985.

If you have any questions, or if you need a personal tour of where these units are, let me know and we can get together.

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c T. E. Clemmons John Blauwkamp Ron VanNoord Gary Roys



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John Blauwkamp

DATE: February 13, 1987

SUBJECT:

PCB Annual Report for 1986

FROM: Gary Roys

6ER

Attached find our quarterly PCB inspections and a copy of a map showing the locations of the PCB transformers.

Attached also find a copy of the PCB transformer and capacity inventory for 12/31/86.

We received an inspection by the environmental quality analyst of the DNR on 11/7/86. Attached are copies of the forms presented to us by Phillip L. Schrantz.

/kj

**~** 70:

PCB File

DATE: February 13, 1987

SUBJECT: PCB Inventory as of 12/31/86

FROM: Gary Roys

all

#### Transformers

Substation #1 1-1000KVA w/ 192 gallons (2495 lbs) Substation #4 2- 750KVA w/ 175 gallons (5200 lbs)

#### Capacitors

Switchroom #1

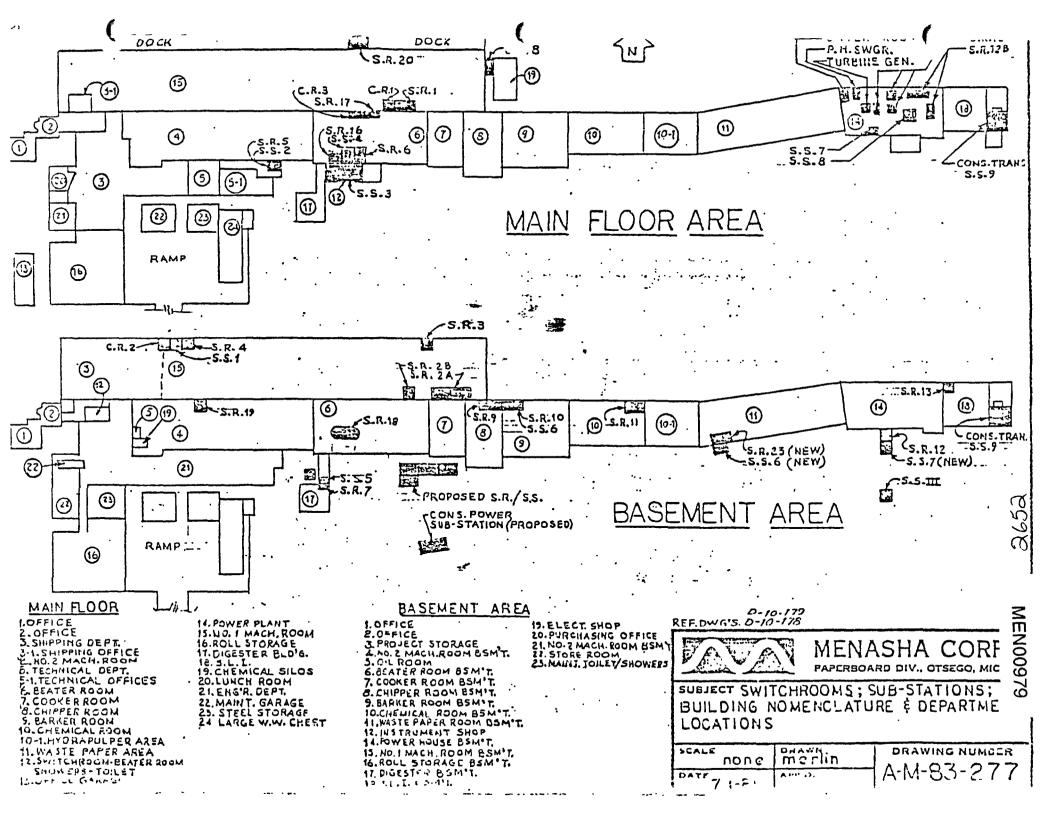
2 - 300 KVAR @ 60 lbs ea. = 180 lbs.

1 - 150 KVAR @ 30 lbs ea. = 30 lbs.

2 - 50 KVAR @ 10 lbs ea. = 20 lbs.

cc: J. Bonham

/kj



QUARTER IST FROM MO. Nou 85 to Fob 1986

LOCATION	SERIAL NO.	KVA	CAT THE STATE	FLUID WT.	TYPE	LEAR	CING	
LOCATION	DEREAD NO.	AVA	GAL. FLUID	KG	FLUID	NO	YES	. COMMENTS
SUBI	,H883017	1000	192	1133	Kyranol	<b>V</b>		
SUB4	H887289A	750	175	1033	Puranel	V		
SuB4	H887289 B	750	175	1033	Purane!	V		
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QUARTER 2 FROM MO. FeBSETO May 1986

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT. KG	TYPE FLUID	LEAK		. COMMENTS
	· .			· ·		NO	YES	
SUBI	H883017	1000	192	1133	Pyropol	X		·
SUB 4	H887289A	750	175	1033	Phranol	X		
SUB4	H887289B	750	175	1033	Piranol	X		
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INSPECTOR Lay E. Hory

DATE 5 May 86

QUARTER 3RD FROM MO.MAY TO HUG 1986

LEAKING FLUID WT. TYPE LOCATION SERIAL NO. GAL. FLUID KVA COMMENTS FLUID NO YES 4853017 3051 1000 192 11=3 H 887291A 175 ルララ 750 SUBH Wir in 4387,2898 Sur 4 175 Promo 1 ルララ 75% MEN00982

INSPECTOR Jun & har

DATE 26 Aug 56

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QUARTER 4th FROM MO. AUG TO NOV 1986

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WI.	TYPE	LEA	KING	
	•			KG	TYPE FLUID	NO	YES	. COMMENTS
SUBJ	H883017	1000	192	44031133	Hyrano 1	/		
SUE 4	H 88 7284A	750	ا کاتنا	1033	Puranol	· L·		
SUB4	H887289B	750	1715	1033	Puranel	V		
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NSPECTOR Jan & MATE

DATE 11/6/86 \_

#### US ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

**SEPA** 

#### TOXIC SUBSTANCES CONTROL ACT

Form A; OMB No. 2010-0001 Approval expires 8-31-85

A DOT	INSPECTION	CONFIDENTIAL	ITY NOTICE

1	. INVESTIGATION IDEN	TIFICATION	2. FIRM NAME						
	INSPECTOR NO.	DAILY SEQ. NO.	Menasha Corporation						
11/07/86	MI-011	<b>₩</b> 03	Farethered Division						
3. INSPECTOR NAM	E		4. FIRM ADDRESS						
Philip L. S	chrantz		320 Farmer Street						
5. INSPECTOR ADD	RESS		Otsego MI 49078	•					
Mich. Dept.	of Natural Res	ources							
	aste Division								
P.O. Box 30	028		6. CHIEF EXECUTIVE OFFICER NAME						
Lansing MI	48909		Fry T Paranty						
			7. TITLE						

#### TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the fecility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business inforation. If you assert a CBI claim, EPA will disclose the information to the extent, and by means of the procedures set forth in the justions (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. (If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," It is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

- The information is not, and has not been, reasonably obtainable
  without your company's consent by other persons (other than
  governmental bodies) by use of legitimate means (other than
  discovery based on showing of special need in a judicial or
  quasi-judicial proceeding).
- 3. The information is not publicly available eisewhere.
- Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed

Marion Young U.S. EPA 5HT-16 Toxic Materials Branch 230 South Dearborn Chicago JL 60604

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE  I have received and read the notice	business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer; it there is another company official who should also receive this information, please designate below.					
SIGNATURE TO THE	NAME					
Today Tanager	TITLEirinin					
TITLE DATE SIGNED	ADORESS					
Toolinical Manager 11-7-86						

& EPA

### US ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

#### TOXIC SUBSTANCES CONTROL ACT

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

RECEIPT	EOD	CAMDI	EC	AND	DOCH	MENITO

1, IN	VESTIGATION IDENT	IFICATION	2. FIRM NAME						
	INSPECTOR NO.	DAILY SEQ. NO.	He masha Corporation						
11/07/85	MI-011	וח	Pararhamid Division						
3. INSPECTOR ADDRE			4. FIRM ADDRESS						
_	of Natural Reso	ources	370 Farmer Street						
Hazardous Wa			Otsego MI 49078						
P.O. Box 300			}						
Lansing MI 4	8909								
_	· · · · · · · · · · · · · · · · · · ·								
		ical substances and/or r ne Toxic Substances Co	mixtures described below were collected in connection with the ontrol Act.						
	RECEIPT OF THE D	DCUMENT(S) AND/OR S	SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:						
No.			DESCRIPTION						
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# **&EPA**

US ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DO 20460

#### TOXIC SUBSTANCES CONTROL ACT

Form Approved OMB No 2070-0007 Expires 3-31-88

EACHITY

			NOTICE OF	INSPECTION	2.4
1.	. INVESTIGATION IDENT		2. TIME	3. FIRM NAME	<u> </u>
Dr.	INSPECTOR NO.	DAILY SEQ. NO.	9.08	Menasha Corporation	
11/07/	86 MI-011	01	1.67.52	Paperhoard Division	
	OR ADDRESS	4		5. FIRM ADDRESS	
	Dept. of Natural			320 Farmer Street	
	ous Waste Divisi			Otsego MI 49078	
P.O. B	ox 30028, Lansin	IG MI 48909			
			REASON FO	OR INSPECTION	
	Under the authority of	f Section 11 of the	Toxic Substance	ces Control Act: PCB Inspection	
凤	ment, facility, or other essed or stored, or held facilities) and any con- with their distribution	r premises in which d before or after th veyance being used in commerce (incl ct applicable to the	chemical subst eir distribution to transport ch uding records, f	photographs, statements, and other inspection tances or mixtures or articles containing same in commerce (including records, files, papers, nemical substances, mixtures, or articles contailities, papers, processes, controls, and facilities tances, mixtures, or articles within or associated.	are manufactured, proc- processes, controls, and ining same in connection bearing on whether the
	In addition, this inspec	ction extends to (C	heck appropria	te blocks):	
	☐ A. Finan	cial data		D. Personnel data	
	☐ B. Sales o	data		☐ E. Research data	
•	C. Pricin	g data			
	The nature and extent	of inspection of su	ich data specifie	ed in A through E above is as follows: .	
NSPECTOR	SIGNATURE ,			RECIPIENT SIGNATURE	
	Silver -			Cyclin Henry	
In.nE				John T. Bonham	
Philip	L. Schrantz	DATE SIG	NED	TITLE	DATE SIGNED
	mental Quality	, /		Technical Hainger	11 7-5%
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**TO**:

DATE:

February 8, 1988

SUBJECT:

FROM:

Otsego Paperboard - PCB Annual Report

for 1987.

Gary Roys

Attached find our quarterly PCB inspection reports and a map showing the location of the PCB transformers.

Attached also find an inventory of the PCB transformers for 12/31/87.

On January 6, 1987, the last seven (7) PCB filled capacitors were removed from service and placed in storage. On 8/25/87, these were picked up by Chemical Waste of Alabama and transported to their facility in Emelle, Alabama. Attached are all appropriate paper work, inspection reports, manifests, etc., for these capacitors. At present we have not received notice of disposal. We have called our representative concerning this matter.

GR/cle

John Bonham

John Blauwkamp

QUARTER 4th FROM MO. Aug to Nov 1987

LOCATION	SERIAL NO.	KVA		FLUID WT.	TYPE	LEAI	KING	
LUCATION	BERTAL NO.	KVA	GAL. FLUID	KG	FLUID	МО	YES	. COMMENTS
Sub 1	H883017	1000	190	1133	Pyranol	Χ		
S4B.4	H 887289A	1/50	175	1033	furanol,	. X.		
SUB4	H 887289 B	750	175	1033	Pyranol	X		
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INSPECTOR Say & Haza

DATE 1/19/57

QUARTER 3RD FROM MO. MAY TO AUG 1987

LOCATION	SERIAL NO.		KVA	GAL. FLUID	FLUID WT.	TYPE FLUID	LEAK NO	ING YES	. COMMENTS
SUB	.H8830171		1000	192	1133	Pyranol	X		
SUB4	H887289A		750	175	1033	Pyranol	X		
SUB4	H.887289B		750	175	1033	Pyranol	X		
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	•								
			•						
		•							
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	, .								
					· .				MEN00989
		<del>"</del>				· · · · · · · · · · · · · · · · · · ·	1		No
L	<u> </u>		<u> </u>	J	<u> </u>	1		1	L

INSPECTOR Hay Exorp

DATE 8/12/87

QUARTER 2 FROM MO. Feb to May 1987

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE	LEAN	ING	
200.2201.	•	WAY	GAL. FLUID	KG	FLUID	МО	YES	. COMMENTS
SUB 1	4883017	1000	192	1133	Pyranol	X		
SUB4	H887289A	150	175	[033	Piranol	X		
SUB4	H 887289 B	750	175	1033	Pirano	X		
						7		,
	•							
		•						
	•							
		<del>                                     </del>	<del> </del>		<del> </del>	1	<del> </del>	
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						]		MEN00990
								99

INSPECTOR Haly En Kang

DATE 11111a, 57

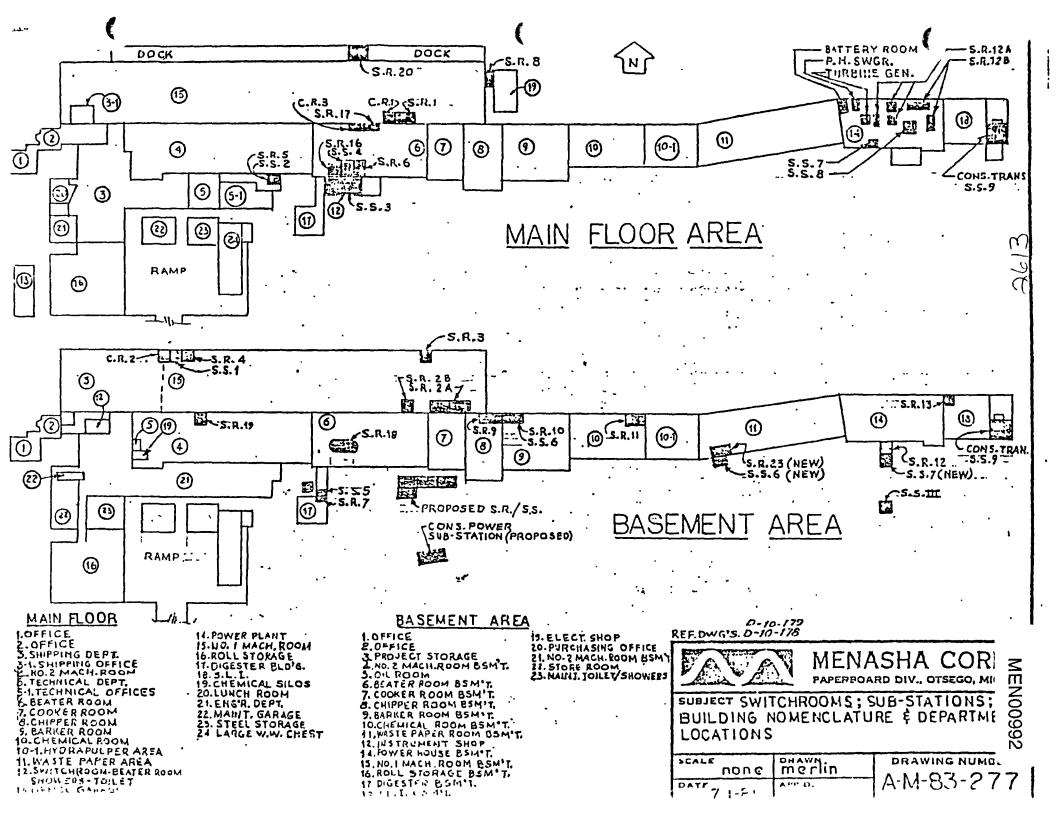
36

QUARTER 15T FROM MO. Nov86 TO FEB 1987

. COMMENTS	
>	
MEN0099	
N	
<del></del> 88	

INSPECTOR Sary E. Kogo

DATE 9 726-8



PCB TRANSFORMER QUARTERLY INSPECTION

to produce the second of the s

QUARTER \_\_\_\_\_ FROM MO. \_\_\_\_ TO . \_\_\_ 19\_\_\_

`[	LOCATION	SERIAL NO.	KVA	GAL. FLU	FLUID WT.	TYPE	LEAKING		COMMENTES	
			500	01111	KG	FLUID	NO	YES	. COMMENTS	
. }		id 1/1 1/1 1/1 1/1					\		9/01/8/6666	
- {		,		·						
		2 drums respective.	Nine	(10 5	Rb		X		8/2/87 KBK	
		,								
		Schums Magseith	2				IX		8/11/87:60M	
		· / ·					1			
		2 drums 2 capace	120				X	1	8/18/82 Bud	
ر		Comme Trager	1115			<u> </u>	1	1	1 7 9/2 / 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
				1			1	1		
		Kturic these di	(/ 5)	Z	- TULY 52	<i>i</i> .	<del> </del>	<del> </del>		
		Auck - Ohernical	1120	10 11 10	T		1			
!			2	,	7.17		1 🗴	<del> </del>	8/35/57 730/m (56/2 3	
,		hanling to boice	Ye.	11.[]	Gille Jours	11/2	<del> </del>	-	5/35/5/ 734m 684X MM	
	<u> </u>	/	1	/		<u> </u>		<u> </u>	Z	

INSPECTOR DATE

2615

A DOOD

7 capacitois removed from PCB TRANSFORMER QUARTERLY INSPECTION unce Sunich Room #1

LEAKING FLUID WT. TYPE LOCATION GAL. FLUID SERIAL NO. KVA COMMENTS FLUID KG YES NO 2 drums - Teapari Ins. 49 each ASKare 2. Such Askare 6/9/87 GER 2d rums - 7 capacitors V 6/18/81 Ga Thur. Icopac. tary Beare Hapartacotricina Kapacita MEN00994

QUARTER \_\_\_\_\_ FROM MO. \_\_\_\_ TO · \_\_\_ 19\_\_\_

2015

DATE \_\_

7 capacifine removed from PCB TRANSFORMER QUARTERLY INSPECTION Switchroom # 1 on 6 gar87

QUARTER	FROM	MO.		TO		19
---------	------	-----	--	----	--	----

LOCATION	SERIAL NO.	אונע	CAL FILITO	FLUID WT.	TYPE FLUID	LEAKING		00.0455,200
Localizon	· ·	KVA	GAL. FLUID			NO	YES	COMMENTS
	2-DRUMS-7eupaciture							
	56	150	4.9 puch	<del></del>	Askairel	. /		4/22/87 GER-
	3.6)-	50	2,5 such		Astale	V		
	2-Deum-7Capacita	₫-				ı		4/29/87/64
	2 drums - 7 capac	tno				X		5/5/87GER
	Den / Capaci	11				X		5/11/87642
	2 drums - Teapaest	W				X		5/19/87 64
	2 dums - 7 capai	itow				X		5/26/87 64
							<u> </u>	Mm 7

V00995 DATE

Tarpacitive removed from Studchroom #1 on Jan 6, 1987

# CAPACITORS PCB TRANSFORMER QUARTERLY INSPECTION

QUARTER \_\_\_\_\_ FROM MO. \_\_\_\_ TO · \_\_\_ 19\_\_\_

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE FLUID	LEAKING			
Econii Ion	ozatal no.	AVA				NO	YES	. COMMENTS	
	7 capacitine 50	150	4. geach		Askarel	<b>L</b> '		3/13/87 BeR_	
	26.	50	3. Seach		Asicare	. 1			
	ALL Texpacitos places							3/17/87 @1	
	In 2- 85 KALLOD SAL	VAGE	Drums		Askarel	V			
	Drums have PCB La	pels.	attaches						
	•								
	2-DRUMS containg the	7 cao	citors		41	V		3/25/87 El	
	)	1							
	2-DRUMS - Teapacit	ers			n	V	1	4/1/87 GER	
		<u> </u>					1		
	2 - Drumis 7 Capacità	la			11	V		4/8/87 OFR	
	1	1	1			1	1		
	2 . Down 02	1.	<del> </del>		71	1/		4/15/87 Bal M	
L	2 Drums 7 Capacis	no	<u></u>	<u> </u>	1	1		4/15/87 Bar MI	

2617

100996

INSPECTOR

Llary & Kozz

DATE

CAPACITOR >

7 capaciturs runsuled from SwitchFoom #1 on JAN 6, 1987

# PCB FRANCEDRMER QUARTEREY INSPECTION

T OCATTON	SERIAL NO.		•	FLUID WT.	TYPE	LEAKING		. Comments	
LOCATION	SERIAL NU.	KVA GAL. FLUID		KG	FLUID	NO	YES		
	Fcaracitorno.					V		1/20/87 BER	
	50	150	4. geach		ASKAREL	•			
	2@	50	2.500cH		ASKAREL.				
	7capacitors	SAN	E AS	ABOUE		<b>V</b>		1/27/87 6812_	
	7 capacitors	Sar	re as	abnix		<b>b</b> ′		2/5/81 Bik	
	Tapre tow.	391	(Lc,	along		ı		219187 6'816	
	7 Capacitors	sam	e as	ilvore		V		2/18/87 GER	
	70a paiortiro	San	ar AB	spre_		1		2/24/87 Bell_	
	7 CAPACITORS	SAME	AS AB	ave	-	X		3/4/87 EER	

INSPECTOR Lary E. How DATE \_\_\_\_

MEN00997

#### SERVICE AGREEMENT

CONTRACT# W05-568-87

PROFILE# T90428 OAK

CONTRACT MAILING LOCATION

CUSTOMER BILLING LOCATION

same

same

AGEMENT, INC. hereby agrees to provide services, including isposal, for waste material generated at the above CUSTOMER nd is described in the attached WASTE MATERIAL PROFILE SHEET. e material will be treated and/or disposed of at the following ch are permitted to receive the described waste material:

e of Alabama t Milemarker 163 5459

000622464

AGI IT, INC. agrees to indemnify Customer for final ns, or settlement in an administrative or judicial action or personal injuries or damage to personal property the which is the sole negligence or intentional misconduct of AGEMENT, INC. Customer agrees to likewise indemnify CHEMICAL INC.

act shall commence on May 22, 1987 and shall continue in nated by either party with or without cause upon thirty (30) notice to the other party.

ment (including the attached Waste Material Profile Sheet) ire understanding between the parties hereto and supersedes agreements, whether written or oral that may exist between the sued by Customer prior to or subsequent to this Agreement.

2620

#### PRICE SCHEDULE\*

#### (Each waste must be approved prior to pricing)

#### Effective January 1, 1987

DRUMMI	ED WASTE	(cont.)	55 Gallon Drum
	2.	Halogens (Weight %) 0 - 4% 4 - 5% 5 - 6% 6 - 7% 7 - 8% 8 - 9% Greater than 9% BTUs	No surcharge \$ 50.00 \$ 62.00 \$ 75.00 \$ 87.00 \$ 100.00 \$ 125.00
	4.	Greater than 10,000 BTU/lb Greater than 7,500 to 9,999 BTU/lb Greater than 5,000 to 7,499 BTU/lb Solids	No surcharge \$ 25.00 \$ 50.00
		1 - 5% Greater than 5%	No surcharge See below - VII.B.
	B. Sol	ids or non-pumpable sludges	
		55 Gallon Drum	55 Gallon Drum
	Sol	ids Less than 5% Halogen	Greater than 5% Halogen
	10. 25. 50.	- 10% \$ 250.00 1 - 25% \$ 300.00 1 - 50% \$ 376.00 1 - 75% \$ 458.00 ater than 75.1% \$ 610.00	\$ 275.00 \$ 330.00 \$ 410.00 \$ 544.00 \$ 725.00
VIII.	LAB PACK	S	\$ 127.00**
IX.	85 GALLO	N OVERPACK SURCHARGE	\$ 30.00 Each
х.	EMPTY DR	UMS (Not crushed)	
		s than 1-inch residue ater than 1-inch residue	\$ 30.00 \$ 63.00

Plus applicable taxes and exclusive of PCB wastes. Plus \$20.00 per drum evaluation fee.

<sup>\*\*</sup> 

#### PRICE SCHEDULE\*

(Each waste must be approved prior to pricing)

#### Effective January 1, 1987

#### DRUMMED WASTE (cont.)

#### XI. SULFIDES AND CYANIDES

Α.	Solids	\$ 102.00
В.	Sludges	\$ 204.00
C.	Liquids	\$ 140.00

#### XII. MINIMUM DISPOSAL FEE AND SURCHARGE SCHEDULE

A. B.	Drummed wastes Surcharge	\$150.00/Profile per shipment \$ 20.00/Drum Surcharge for drummed solids less than 90%
c.	Surcharge	full. \$ 25.00/Drum Surcharge for sludge waste shipped in
D.	Initial waste stream evaluation charge	closed-top bung type drums \$225.00/Waste stream

<sup>\*</sup> Plus applicable taxes and exclusive of PCB wastes.

#### PRICE SCHEDULE\*

#### (Each waste must be approved prior to pricing)

#### Effective January 1, 1987

#### BULK WASTE

I.	INO	RGANIC SOLIDS	\$	92.00/Ton **					
II.	ORGA	ANIC SOLIDS	\$	115.00/Ton **					
III.	INOF	RGANIC LIQUIDS	\$	0.99/Gallon					
IV.	ORGA	NIC LIQUIDS							
	Α.	Suitable for fuel or recycle		ntact Sales presentative					
	В.	Not suitable For fuel or recycle program		sed on sample alysis					
٧.	PALL	PALLETS (Single layer stack)							
	A. B.	Solid Liquid or sludge	\$ \$	330.00 Each 550.00 Each					
VI.	TRUC	K WASHOUTS (As required by Law)	\$ \$	0.99/Gallon 150.00 Minimum charge					
VII.	MINI	MUM DISPOSAL FEE AND SURCHARGE SCHEDULE							
	A. B. C. D.	Bulk Solids Bulk Liquids Initial waste stream evaluation charge Surcharge for liquid in roll off or dump trailers		,100.00/Shipment ,000.00/Shipment 225.00/Waste Stream 450.00/Shipmen					

 $<sup>\</sup>star$  Plus applicable taxes and exclusive of PCB wastes.

<sup>\*\*</sup> Based on a density of 2,000 pounds per cubic yard.



# GENERATOR'S WASTE MATERIAL PROFILE SHEET MISCELLANEOUS SPECIAL WASTE MEN01002 T 90428



INSTRUCTIONS FOR COMPLETING THIS FORM ARE FOUND ON THE OPPOSITE SIDE RETURN THIS FORM AND ATTACHM	IENTS TO
A GENERAL INFORMATION	· (ALSIP LTL)
GENERATOR NAME L MENASHA CORPORATION TRANSP	ORTER WASTE MANAGEMEN TINC
FACILITY ADDRESS L 320 N. FARMER St. TRANSPI	ORTER PHONE L
. Otsego, M1 49078 genera	TORUSEPAID MI 1, D, 0, 0, 6, 0, 1, 2, 4, 0, 5
	TOR STATE ID
TECHNICAL CONTACT L GARY E, ROYS TITLE PROCESS CIN	PMIST I PHONE 616-692-6141
NAME OF WASTE L PCB Capacitors	, ,
PROCESS GENERATING WASTE OUT OF SERVICE CAFACITURS	
B CLASSIFICATION OF WASTE MATERIAL (FROM INSTRUCTIONS)  PCB CAPACITORS	
DESCRIPTION OF MATERIAL FOLLOW SUPPLEMENTAL INSTRUCTIONS)  SQUEN (7) PCB CAPACITORS filled (UI+h A	SKAREL
Five (5) - 150KVARCE 20 LBS each (4.96ALECTURE) - 50KVAR & 10 LBS each (2.5 GHL)  Serial Nos. 122735 (64256) 122737 122732 046374	each )
These were removed from Bervice LoJan 8 been placed in 2-85 gallon disposal pockets filled with an oil absorbant.	7. They have I drums, with
ATTACHMENTS (INDICATE BELOW WHAT ATTACHMENTS — ANALYSIS STUDIES, PRODUCT SPEC SHEETS, ETC — ARE MA	NOEL ;
C SHIPPING INFORMATION	
METHOD OF SHIPMENT BULK LIQUID BULK SOLID ADRUM (TYPE/SIZE) & 856AL	
ANTICIPATED VOLUME 12-8594 ULUMSI GALS L	OTHER L
THE THAT	
UNLESS CLEARLY STATED ABOVE OR IN THE ATTACHMENTS, THIS WASTE MATERIAL IS NOT A "HAZARDOUS WASTE" AS WHICH THE WASTE IS NOW LOCATED  THE WASTE DOES NOT CONTAIN POLYCHLORINATED BIPHENYLS OR 2, 3, 7 8 TCDD UNLESS CLEARLY NOTED  THIS SHEET AND ITS ATTACHMENTS CONTAIN TRUE AND ACCURATE DESCRIPTIONS OF THE WASTE MATERIAL AND ALL HAS BEEN DISCLOSED  ACCURATED  TO DO TO THE WASTE MATERIAL AND ALL HAS BEEN DISCLOSED	
NAME DAR E 1001	



#### NOTIFICATION OF ACKNOWLEDGEMENT

Generator Menasha Corp. Otsega, MI
Enclosed are your Generator Number two copy (copies) 341547
of the Alabama Manifest. This copy is acknowledgment that Chemical
Waste Management, Inc., Emelle, Alabama has received your load.
Emelle Facility  Signature:   Arathy Claim
Title: Regulatory Document Control Clerk
Date: 9-28-87



# HAZARDOUS WASTE MANIFEST

.,	, •	- (As nequired by the Al	iabama Departmei	IR OI LIIVI	Oinne		•				
		use on elite (12-prtch) typewriter.)			0.0-			0000 Expires 9-30-88			
A	UNIFORM HAZARD WASTE MANIFE			Manifest cument No 1 0 0 2	2. Pag of	e l Informati Is not law	reduited	shaded areas by Federal			
	3 Generator's Name and Mailing MENASHA CORPORAT	Address					70-4				
	PO BOX 155/320 NFG										
	OTSEGO, MI 490										
	4. Generator's Phone ( C C ) 5 Transporter 1 Company Name	6	US EPA ID Num	nber	0.5						
	Chemical Waste	Chemical Waste Management IIID 0 9 9 3 0 8 6 D Tangories 7 Transporter 2 Company Name 8. US EPA ID Number E State Transporter 2									
	7 Transporter 2 Company Name	8.	US EPA ID Num	nber	E.Su	a Transporter's	<u>D</u>	7.72			
	Chemical Waste	Management IIIN	1109 8 0 9 9 9 US EPA ID Num	691210	F. Tra	aponer's Phone					
	9. Designated Facility Name and	Site Address 10	US EPA ID Num	nber	G.Ster	e (Facility's .E)		7.7			
	CHEMICAL WASTE MANAGE Emelle Facility	EMENT, INC									
	Alabama Highway 17 at Mile M	larker 163	L, D, O, O, O, 6, 2,	2141614	major Asir 3	15/652-97					
	Emelle, Alabama 35459		<u></u>	12 Cont		13.	14.				
1	11	roper Shipping Name, Hazard Class, an	•	No	Туре	Total Quantity	Unit Wt/Vo	Water 16			
G		S WASTE SOLLO N	V.O.S PLB								
N E	N 10/4/54	CWM Profile Number	Tank10	0.0.2			p 🎘				
Ā	l l	CWM Profile Number	1 70728	1000	DM	0101500	/				
7	T										
O R	O R	CWM Profile Number		1 1 1		1 1 1 1					
١.	c.										
<b>`</b>	1Į										
,,' K. I.	ı İ d	CWM Profile Number					- V	***			
	[]										
		CWM Profile Number			1 1	1111					
	J. Additional Descriptions for Man	terials Listed Above		<u> </u>	K. Handling Codes for Wastes Listed Above						
					~ <	3U					
		м		-	a. ~		. eu <b>€</b> 100 ° 20 - 20 °				
				•	ь	,	and ""	-			
	15. Special Handling Instructions a				l	1	1 1				
	Handle pursuant +	040CFR Part 761,	Dike and C	ontair	טור	east of	IE4 K	1901			
	1.1	PCB weight -1701	-02.			•					
	PO# 4817266	ON I hereby declare that the contents	of this consignment are to	ully and accur	ately de:	scribed above by					
	proper shipping name and are cla	assified packed marked and labeled a	and are in all respects in p	proper conditi	on for tr	ansport by highwa	Y				
	11	onal and national government regulation, it certify that I have a program in place		d toxicity of w	aste gen	erated to the degr	ee I have de	termined to be			
	economically practicable and that	t I have selected the practicable method d the environment OR, if I am a small q	of treatment storage, or	disposal curre	ently ava	ilable to me which	minimizes t	he present and			
1	the best waste management met	thod that is available to me and that I c	an afford		}						
۷	GARY E ROY	5	Signatur	2/1/	ر کمبر محاد		MO LA	onth Day Year			
H	T 17.Transporter 1 Acknowledgemen			<u> </u>	1	<del></del>		E1015101/			
R A N	R		Signature		<i></i>	<del></del>	Mo	nth Day Year			
SP	BUTCH 1	BUTCH HOUSE Butch flow.									
OR T	18.Transporter 2 Acknowledgemen	it of Receipt of Materials									
Ţ	Printed/Typed Name	PousE	Signature Butter	ale.				nth Day Year			
_	19.Discrepancy Indication Space	00>15	1- will	Mor	~~	<del></del>		8121212			
F	F										
Ã.	A C	~ . ~	`~								
Į L	l J	3(3	<u> </u>								
ţ	V	rtification of receipt of hazardous r		manifest	except a	s noted in Item		ath Day			
1	Printed Typed Name	1 5	Signature	1		1	Mo.	nth Day Year			



# HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

.a	` 👿	nequired by The Alabama Depart			-	
, T	ise printegrappe. (Form designed for use on eli	te (12-pitch) typewriter.)	Manifest	Form 2. Page 1		050-0000 Expires 9-30-88
A	UNIFORM HAZARDOUS WASTE MANIFEST	MIDIOIOIG011214051	Document No	of	is not requi	red by Federal
	<ol> <li>Generator's Name and Mailing Address MENASHA CORPORATION</li> </ol>			A Suns Ma	nifest Document.	Number C.J.D
	POBOX 155/320 MFarmee	ST		B. State Go	nerator's (D = 3	<u> </u>
	OTSEGO, MI 49078 4 Generator's Phone (616)692-	6141				
	5 Transporter   Company Name	6. US EPA ID		Service Systems	neporter's 10	and the
	Chamical Waste Mana	agement II LID 01919121	018161811	D. Transport	4 2.5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	Chemical Wasteman		1	E.State Tra	er's Phone	
-	9 Designated Facility Name and Site Addi		Number	G. State Fac		
	CHEMICAL WASTE MANAGEMENT, I Emelle Facility	NC.	,			
	Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459	1 A L D 0 0 0 0 6	2   2   4   6   4	H. Facility's 205/6	52-9721	
	11. US DOT Description (Including Proper Ship)		12. Cont	ainers	13. 14 Total Unit	100 HE 1258 W
G	a. RO HAZARDOUS WA	STE SOLID NO.S PC	R	Туре С	Quantity Wt/Vo	Waste No.
E	10/4/54					三基體
E		CWM Profile Number 7 90428	002	DMOID	1500 P	
A	b.					
0		CWM Profile Number			1 1 1	
Ι,	C.		<del></del>		· <del></del>	
1						
	d.	CWM Profile Number			<u> </u>	*
		CWM Profile Number			بسليليلي	
	J. Additional Descriptions for Materials Lis	ted Above		K. riangling i	Codes for Wastes L	Jeted Above
	, the state of the			a.50	· c	
	a share the same of the same o			,	<b>*</b>	
	15. Special Handling Instructions and Additi	onal Information	·	Ъ.	d.	<del></del>
	Handle pursuant to 400	LFR Part761. Dike and	contain	1 in ca	ie of lea	. king or
		weight -170 LBS.			·	Ü
	PO# 4817266 16 GENERATOR'S CERTIFICATION, I hereb	by declare that the contents of this consignment	are fully and accur	ately described	d above by	
	proper shipping name and are classified, pa according to applicable international and na	icked marked and labeled and are in all respect	is in proper conditi	on for transpoi	rt by highway	
	If I am a large quantity generator. I certify th	nat I have a program in place to reduce the volum	ie and toxicity of w	aste generated	i to the degree I hav	ve determined to be
	future threat to human health and the enviro	ected the practicable method of treatment storagonment. OR, if I am a small quantity generator. I h	je or disposal curre iave made a good fa	ently available i with effort to mi	to me which minimi nimize my waste ge	zes the present and ineration and select
	the best waste management method that is Printed/Typed Name	available to me and that I can afford Signatur	06	<del>)</del>		Month Day Year
I	GARY E. ROYS	Bas	691	45		101812151817
T R	17.Transporter 1 Acknowledgement of Rece Printed/Typed Name	eipt of Materials   Signature	/	Ø		Month Day Year
ANSPORTER	RUTCH HOUS		Z 1/2	۔ س		IO 81 315787
Po	18.Transporter 2 Acknowledgement of Rece					
TE	Printed/Typed Name	Signature	01			Month Day Year
R	19.Discrepancy Indication Space	1= 13 ml	I Blow	er	<del></del>	<u> 1815 کا ۱۵ ان الاسل</u>
F	. S. S. Saray managinari apaca					
FACIL	*	7/71				
	20 Facility Ones as Occasion Cont.	and the second of receipt of hazardous materials covered by	w this maritan			
¥	20.Facility Owner or Operator, Certification Printed Typed Name	of receipt of hazardous materials covered by	<u> </u>		led in item 19	Month Day Year
•			Kan	< \)	Mez	

AN AT 1:800:292-4708 OR OUT OF STATE AT 517:373-7860 AND THE NATIONAL RESPONSE

ALI 🔻 .. S MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN CEN. ... AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 4-85)

DO NOT WRITE IN THIS SPACE ATT. DIS. REJ. D

1979, as 1969 MEN01006

Failure to section 25.
Act 136 PA 1969

lease print or type					oved OMB No			
	1 Generator's US EPA 10 M     D 0 0 6 0 1	No. No. N	lanifest iment No 7 00 1	2 Page 1 of			ne shaded ar ed by Fede	
3. Generator's Name and Mailing Address MENASHA CORPORATION POBOX 155 / 320 N FARMER				MI	Manifest Do	189		
4 Generator's Phone (616) 69		UC COA ID N		:		. : -	, - ·	
5 Transporter 1 Company Name Chemical Waste Managemen	4 5715	US EPAID NUM			Transporter			
7 Transporter 2 Company Name	8.	US EPA ID Num			porter's Pho Transporter		<del></del>	
Chemical Waste Manager	nint IIVID	191810191916	191210	F. Transr	orter's Pho			<del></del>
9. Designated Facility Name and Site Ad	dress 10.	US EPA ID Num			Facility's II		=	
Chemical Waste of Alak			1	4,	11	] I }	<u>.</u> =	
Highway 17N at MDe ma EMELLE, ALABAMA 25	159 ALD	0006224	141	H. Facili	ty's Phone	: 1 + 8 : 1 + 8 : 1 + 8		
11. US DOT Description (including Proper and HM ID NUMBE	Shipping Name, Hazard R).	Class, and	12.Conta	iners Type	13 Total Quantity	14 Unit Wt/Voi	I. Waste No.	N/H
RQ HAZARDOUS	WASTE SOLI	os N.O.S.						$\Box$
X PCB 10/4/54			0012	DIMO	1500	P		
Λ   b.							-	
R								
C.							. 1.	
		·					111	
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Michigan DNR

Box 30038

To be mailed by

Generator to

IGAN AT 1 800 292 4708 OR OUT OF STATE AT 517 373 7860 AND THE NATIONAL RESPONSE

ALL 1.1LS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN CENTER AT 1 800 424 8802 24 HOURS PER DAY Failure to section 2 Act 136

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# OF NATURAL RESOURCES

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800 292 4708 OR OUT OF STATE AT 517 373 7860 AND THE NATIONAL RESPONSE CENTER AT 1 800-424 8602 24 HOURS PER DAY

EPA Form 8700-22 (Rev 4-85)

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section Act 136 PA 1969

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# CHEMICAL WASTE MANAGEMENT, INC. Fort Wayne Transportation Division

2701 S. Coliseum Bivd., Suite 1016 P.O. Box 6070

Fort Wayne, Indiana 46896 Phone: (219) 423-1655

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AT 1 800 292 4706 OR OUT OF STATE AT 517 373 7660 AND THE NATIOMAL RESPONSE

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MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, DAY

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section Act 136 PA 1969

Form Approved OMB No 2000-0404 Expires 7 31 86 Please print or type 1 Generator's US EPA ID No Manifest 2.Page 1 Information in the shaded areas UNIFORM HAZARDOUS Document No is not required by Federal A11111 开枪压口 WASTE MANIFEST A State Manifest Document Number Generator's Name and Mailing Address State Generator's ID ----Generator's Phone ( US EPA ID Number Transporter 1 Company Name State Transporter's ID 14-11-11-31-31-31 Transporter's Phone Transporter 2 Company Name US EPA ID Number State Transporter's D THE STATE · \$ · 14 · F. Transporter's Phone US EPA ID Number Designated Facility Name and Site Address G. State Facility's JD. He Facility's Phone rif 12 Containers 11 US DOT Description (including Proper Shipping Name, Hazard Class, and Total Unit ID NUMBER) HM Type Quantity ME/Vo N 10751 A b 0 ā 3 S d 3 3 Additional Descriptions for Materials Listed Above Handling Codes for יון האוש אנירקינוני יוקר אינול אינו son property 15 Special Handling Instructions and Additional Information 7115 1-مستري م 417 ĩ 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment ; j \$ 3 Manth Day Printed/Typed Name Signature 17 Transporter 1 Acknowledgement of Receipt of Materials **>** 7 Dète Printed/Typed Name Signature • ₹ 18 Transporter 2 Acknowledgement or Receipt of Materials Day .: Printed/Typed Name Signature š - 3 19 Discrepancy Indication Space GENER 3 ŏ • Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 3 = 3 5 7 7 7 7 2 3 5 <Dañ Signature Manth Day Printed/Typed Name

EPA Form 8700-22 (Rev. 4-85)

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# HAZARDOUS WASTE MAN.

MEN01011

(As Required By The Alabama Department of Environmental Management)

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	SIGNED	
ORIGINATOR WRITE MESSAGE IN UPPER PORTION ONLY - REPLY SHAP OUT YELLOW COPY FOR FOLLOW UP		
	SIGNED	

SENDER'S FILE COPY

RECEIVER REPLY ON LOWER PORTION RETAIN PINK COPY - RETURN WHITE COPY TO SENDER



May 22, 1987

MENASHA CORPORATION 320 N. Farmer Street Otsego, MI 49078 Attn: Mr. Gary E. Roys

Dear Mr. Roys:

We are pleased to enclose, <u>SIGNED ON BEHALF OF CHEMICAL WASTE MANAGEMENT</u>, <u>INC.</u>, <u>OUR CONTRACT FOR YOUR WASTE MATERIALS</u>. Please sign or have a representative of your company sign both copies immediately, in order to ensure prompt service. RETURN ONE COPY IN THE ENCLOSED ENVELOPE AND RETAIN ONE COPY FOR YOUR FILE. It is <u>IMPORTANT TO NOTE THAT NO CHANGES MAY BE MADE TO THE CONTRACT WITHOUT THE CONSENT OF CHEMICAL WASTE MANAGEMENT</u>, <u>INC.</u> We anticipate this procedure will expedite the management of your waste materials.

ANY PURCHASE ORDERS OR QUESTIONS IN REGARD TO INVOICING should be directed to the following BILLING FACILITY:

Chemical Waste Management 11700 S. Stony Island Ave. Chicago, IL 60617 (312) 646-5700

After we have received the fully executed contract, YOU MAY SCHEDULE YOUR WASTE TO BE REMOVED BY CONTACTING THE FOLLOWING FACILITY:

Chemical Waste Management 4300 W. 123rd Street Alsip, IL 60658 (312) 396-1060

YOUR CALL TO SCHEDULE SHOULD BE DIRECTED TO THE SCHEDULING OR CUSTOMER SERVICE REPRESENTATIVE AT THIS FACILITY. Have your generator's waste material profile number available and inform the facility that the signed contract has been sent to contracting.

Page 2 same

Prices quoted are effective for thirty (30) days from the above date. Any delay in executing the enclosed agreement may lead to increases in pricing under the applicable price escalation clause.

If you have any questions feel free to contact the District Office of your sales representative, Mark Payne at (312) 218-1526.

Chemical Waste Management would like to take this opportunity to thank you for your business.

Sincerely,

Bill Gamlin

Customer Service Manager

BG/jlk Enclosure

#### SERVICE AGREEMENT

CONTRACT# W05-568-87

PROFILE# T90428 OAK

CUSTOMER SERVICE LOCATION CONTRACT
MAILING LOCATION

CUSTOMER
BILLING LOCATION

MENASHA CORPORATION 320 N. Farmer Street Otsego, MI 49078

ATTN: Mr. Gary E. Roys

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same

CHEMICAL WASTE MANAGEMENT, INC. hereby agrees to provide services, including treatment and/or disposal, for waste material generated at the above CUSTOMER SERVICE LOCATION and is described in the attached WASTE MATERIAL PROFILE SHEET. The described waste material will be treated and/or disposed of at the following facility(ies), which are permitted to receive the described waste material:

Chemical Waste of Alabama Highway 17N at Milemarker 163 Emelle, AL 35459

EPA I.D. ALD000622464

#### SPECIAL PROVISIONS:

CHEMICAL WASTE MANAGEMENT, INC. agrees to indemnify Customer for final judgments, decisions, or settlement in an administrative or judicial action against Customer for personal injuries or damage to personal property the proximate cause of which is the sole negligence or intentional misconduct of CHEMICAL WASTE MANAGEMENT, INC. Customer agrees to likewise indemnify CHEMICAL WASTE MANAGEMENT, INC.

#### TERM:

This Service Contract shall commence on May 22, 1987 and shall continue in effect until terminated by either party with or without cause upon thirty (30) days prior written notice to the other party.

#### ENTIRE AGREEMENT:

This Service Agreement (including the attached Waste Material Profile Sheet) represents the entire understanding between the parties hereto and supersedes any and all prior agreements, whether written or oral that may exist between the purchase orders issued by Customer prior to or subsequent to this Agreement.

### DESCRIPTION OF SERVICES TO BE PROVIDED:

#### FEES:

Disposal: \$1.25 per pound gross weight. \* \$150.00 minimum disposal

fee.

Transportation: \$79.00 per drum plus \$75.00 pick-up charge.

Generator will be allowed  $1\frac{1}{2}$  hour(s) loading time at their facility with anytime thereafter being considered demurrage and charged at the rate of \$80.00 per hour.

The fees set forth are subject to change at anytime during the term hereof upon Disposer providing Generator with at least thirty (30) days advance written notice.

DISPOSAL METHOD: Incineration

#### SPECIAL CONDITIONS:

Drums per DOT properly labeled.

PRICED AS PROFILE, INVOICED AS RECEIVED.

See Attachments (If Applicable).

This decision is valid through 05/11/88.

#### NOTES:

Unless noted, the above prices do not include applicable fees and LOCAL, STATE or FEDERAL TAXES which, if assessed, shall be invoiced to and payable by the customer on an actual cost basis. If customer is to supply the waste materials containers, Customer will be solely responsible for the appropriate constructions, marking and labeling of the containers.

#### PAYMENT TERMS:

NET THIRTY (30) DAYS

COMPANY NAME: MENASHA CORPORATION  BY:	CHEMICAL WASTE MANAGEMENT, INC.  BY:  Andrew J./Flanagan
TITLE:	TITLE: Sales Manager - Northern Region
DATE:	DATE:

jlk/MP/SF-/S-CWM AL/T-ALSIP

#### **DEFINITIONS**

ORGANIC WASTE:

Any waste containing 10% or greater non-halogenated organic components or greater than 0.1% halogenated organic

components.

HALOGENATED ORGANIC WASTE:

Any waste containing greater than 1%

halogenated organic components.

INORGANIC WASTE:

Any waste containing less than 10%

non-halogenated organic components and/or

less than 0.1% halogenated organic

components.

SLUDGE WASTE:

Any waste containing solid materials which cannot be completely removed from

the drum by pumping.

BULK SOLID WASTES:

Inorganic and/or organic liquids or sludges must not be solidified with absorbents of any kind to produce a

bulk solid waste.

F-SERIES WASTES:

EPA waste codes F001, F002, F003, F004, and F005 as defined in CFR 40.261.31 and which are not subject to the two year

national variance.

#### PRICE SCHEDULE\*

(Each waste must be approved prior to pricing)

#### Effective January 1, 1987

DRUMMI	ED WA	STE	<u>55 (</u>	Gallon Drum
I.	INO	RGANIC SOLIDS	\$	63.00
II.	INO	RGANIC LIQUIDS	\$	89.00
III.	INO	RGANIC SLUDGE	\$	98.00
IV.	ORG	ANIC SOLIDS EXCLUDING F-SERIES WASTES	\$	80.00
	A. B.	Must pass paint filter test Biodegradable or compressible absorbents are not ac	ccepta	ble
v.	ORGA def:	ANIC LIQUIDS (Drums must be empty after pumping per Finition) EXCLUDING F-SERIES WASTES	RCRA	
	A. B.	For non-fuel or non-recycle waste For fuels or recycle program	\$	259.00
	ь.	1. Less than 2% halogen 2. Greater than 2% halogen	\$	62.00
		but less than 25%		259.00
		3. Greater than 25% halogen	Ş	330.00
VI.	ORGA	ANIC SLUDGES EXCLUDING F-SERIES WASTES		•
	A. B.	For non-fuel or non-recycle waste Liquid layer for fuels or recycle program	\$	259.00
	Δ.	<ol> <li>Less than 2% halogen</li> </ol>	\$	114.00
		<ol> <li>Greater than 2% halogen but less than 25%</li> </ol>		259.00
		3. Greater than 25% halogen	\$	330.00
VII.	F-SE	ERIES WASTES**		
	A.	Base price for liquids and sludges	\$	75.00
		Surcharges		
		1. Free water \$ 1.00/Gal	lon o	f water

 $<sup>\</sup>star$  Plus applicable taxes and exclusive of PCB wastes.

<sup>\*\*</sup> Additional charges for heavy metals and/or repackaging may apply.

#### PRICE SCHEDULE\*

(Each waste must be approved prior to pricing)

#### Effective January 1, 1987

DRUMME	D WASTE (cont.)	55 Gallon Drum
	2. Halogens (Weight %) 0 - 4% 4 - 5% 5 - 6% 6 - 7% 7 - 8% 8 - 9% Greater than 9%	No surcharge \$ 50.00 \$ 62.00 \$ 75.00 \$ 87.00 \$ 100.00 \$ 125.00
	3. BTUs Greater than 10,000 BTU/ Greater than 7,500 to 9, Greater than 5,000 to 7, 4. Solids 1 - 5% Greater than 5%	1b No surcharge 999 BTU/1b \$ 25.00
	B. Solids or non-pumpable sludge	s
	55 Gallon Dr	um 55 Gallon Drum
	Solids Less than 5% Ha	logen Greater than 5% Halogen
	5.1 - 10% \$ 250.00 10.1 - 25% \$ 300.00 25.1 - 50% \$ 376.00 50.1 - 75% \$ 458.00 Greater than 75.1% \$ 610.00	\$ 275.00 \$ 330.00 \$ 410.00 \$ 544.00 \$ 725.00
VIII.	LAB PACKS	\$ 127.00**
IX.	85 GALLON OVERPACK SURCHARGE	\$ 30.00 Each
х.	EMPTY DRUMS (Not crushed)	
	A. Less than 1-inch residue B. Greater than 1-inch residue	\$ 30.00 \$ 63.00

Plus applicable taxes and exclusive of PCB wastes.

Plus \$20.00 per drum evaluation fee.

#### PRICE SCHEDULE\*

(Each waste must be approved prior to pricing)

Effective January 1, 1987

#### DRUMMED WASTE (cont.)

#### XI. SULFIDES AND CYANIDES

A.	Solids	\$ 102.00
В.	Sludges	\$ 204.00
C.	Liquids	\$ 140.00

#### XII. MINIMUM DISPOSAL FEE AND SURCHARGE SCHEDULE

Α.	Drummed wastes	\$150.00/Profile per shipment
В.	Surcharge	\$ 20.00/Drum Surcharge for
	•	drummed solids less than 90%
		full.
С.	Surcharge	<pre>\$ 25.00/Drum Surcharge for</pre>
	•	sludge waste shipped in
		closed-top bung type drums
n	Initial waste stream	\$225 00/Waste stream

evaluation charge

Plus applicable taxes and exclusive of PCB wastes.

#### PRICE SCHEDULE\*

(Each waste must be approved prior to pricing)

#### Effective January 1, 1987

#### BULK WASTE

I.	INOR	RGANIC SOLIDS	\$	92.00/Ton **
II.	ORGA	NIC SOLIDS	\$	115.00/Ton **
III.	INOR	GANIC LIQUIDS	\$	0.99/Gallon
IV.	ORGA	NIC LIQUIDS		
	Α.	Suitable for fuel or recycle		ntact Sales presentative
	В.	Not suitable For fuel or recycle program		sed on sample alysis
V. PALLETS (Single layer stack)				
	A. B.	Solid Liquid or sludge	\$ \$	330.00 Each 550.00 Each
VI.	TRUC	K WASHOUTS (As required by Law)	\$ \$	0.99/Gallon 150.00 Minimum charge
VII.	MINI	MUM DISPOSAL FEE AND SURCHARGE SCHEDULE		
	A. B. C. D.	Bulk Solids Bulk Liquids Initial waste stream evaluation charge Surcharge for liquid in roll off or dump trailers	•	,100.00/Shipment ,000.00/Shipment 225.00/Waste Stream 450.00/Shipmen

<sup>\*</sup> Plus applicable taxes and exclusive of PCB wastes.

Based on a density of 2,000 pounds per cubic yard.

# GENERATOR'S WASTE MATERIAL PROFILE SHEET MISCELLANEOUS SPECIAL WASTE



WASTE PROFILE SHEET CODE

OAK T90428

ONS FOR COMPLETING THIS FORM ARE FOUND ON THE OPPOSITE SIDE RETURN THIS FORM AND ATTACHMENTS TO:

· .			MEN01023
A GENERAL INFORMATION		1 CALSIAL	74)
GENERATOR NAME: MENE	ASHA CORPORATION	THANSPORTER WASTE M.	
FACILITY ADDRESS: 1320 1	_	1 TRANSPORTER PHONE: L	
	50 MI 49078	GENERATOR USEPA I.D. [M. ], D. (	0,0,6,0,1,2,4,0,5
· · ·		GENERATOR STATE I.D. L	
TECHNICAL CONTACT: LEAR		1 TITLE: Process Chemist 1 PHONE:	616-692-6141
NAME OF WASTE PCB	Capacitors	A Jan - Sang Little House officer and the speed a speed from the	And grade with the factor of the
PROCESS GENERATING WASTE: L	OUT OF SERVICE CAPA	CITORS	
B CLASSIFICATION OF WASTE MATERIAL (FOLLO)  DESCRIPTION OF MATERIAL (FOLLO)	VERIAL (FROM INSTRUCTIONS):  WE SUPPLEMENTAL INSTRUCTIONS):  PCB CAPACITORS +	11/2 pen DAUN 1175 pen pick	n plus
Five (5) - +wo(2) -	150KVAR@ 30 LBS each 50KVAR@ 10 LBS each 150KVAR 50K 5, 122735 064	ch (4.9 GAL each) ch (2.5 GAL EACH) (3)=	30 /1/L
been place	122737 127722 046374 re removed from ser	ruice 6Jan 87. They ha on disposal drums, w absorbant.	ve 1+h
ATTACHMENTS (INDICATE BELOW W	HAT ATTACHMENTS — ANALYSIS, STUDIES, PRODUC	#1.25 PM	
,	in the ware	Total mor	
C SHIPPING INFORMATION	**		
ANTICIPATED VOLUME: L2-85	LIQUID BULK SOLID SORUM (TYPE/SIZE) L AC CLUMS GALS L  MONTH QUARTER VEAR L	85GAL OTHER L	<u> </u>
ENERATOR CERTIFICATION. BY SIG  UNLESS CLEARLY STATED ABOVE ( WHICH THE WASTE IS NOW LOCAT THE WASTE DOES NOT CONTAIN P  THIS SHEET AND ITS ATTACHMENT HAS BEEN DISCLOSED	NING THIS PROFILE SHEET, GENERATOR CERTIFIES OR IN THE ATTACHMENTS, THIS WASTE MATERIAL IS TED. OLYCHLORINATED BIPHENYLS OR 2, 3, 7, 8 - TCDD, U	NOT A "HAZARDOUS WASTE" AS DEFINED BY EITHER USEPA (4	

≈ORM 561

memo CORPORATION

TO:

John Blauwkamp

DATE:

April 24, 1989

SUBJECT:

Otsego Paperboard

PCB Annual Report for 1988

FROM:

Gary Roys

Attached find our quarterly PCB inspection reports, and a map showing the location of the PCB transformers.

Attached also find an inventory of the PCB transformers for 12-31-88.

Attached is the notice of disposal of the (7) seven PCB filled capacitors, which were taken by Chemical Waste Management Inc. to their Emelle, Alabama facility. All other appropriate paperwork was attached to the 1987 PCB Annual Report.

On August 1, 1988, Menasha Corporation's Corporate Policy for disposal of florescent light ballasts was reissued. Copies were sent to Ron VanNoord (Electrical/Instrument Foreman), Ken Hartman (Maintenance Manager), and John Bonham (Technical/Engineering Manager).

A waste material profile sheet for a 80 gallon drum of PCB florescent light ballasts was sent, three times, to Chemical Waste management to obtain quotes, etc. for their disposal (copies attached).

cc: John Bonham

/ac



O:

John Blauwkamp

DATE: February 22, 1990

SUBJECT: Otsego Paperboard PCB Annual Report for 1989 FROM:

Gary Roys

Attached find our quarterly PCB inspection reports, and a map showing the locations of the PCB transformers.

Attached also find an inventory of the PCB transformers for 12/31/89.

Attached is a memo from Robert Gulbranson concerning the disposal plans for the PCB transformer, serial # H883017 located in substation #1. Also find the manifests for transportation of the PCB oil and transformer to the disposal facilities, from substation #1.

On May 8, 1989 a slight PCB leak was found at the plug in the drain line of the transformer H887289B. A memo concerning the action taken and the clean up of this leak is attached, along with weekly inspections of this transformer for four weeks.

cc: John Bonham Keith Kling

### PCB TRANSFORMER QUARTERLY INSPECTION

	. ,5T		
QUARTER		FROM MO. Nov 88 TO 72	b 1989

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE FLUID	LEAK NO	ING	. COMMENTS
SUBI	H883017	1000	192	1133	Pyranol	X		Warm in control room -
SUB 4	H887289A	150	175	1033	Pyrano/	`X		Warm in Control soon -
SUB4	H.887289B	750	175	1033	tyrano/	X		
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John Bonham

May 19, 1989

SUBJECT:

FROM:

DATE:

PCB Spill

Gary Roys

On May 8, 1989, at 11:25 a.m., while doing the second quarter PCB transformer inspection, a slight leak at the plug in the drain line of transformer H887289B was found. This transformer is located in substation 4. This leak was small and could not be measured. It was confined to the angle-iron frame of the transformer and covered an area of less than 3" x 3".

Keith Kling, John Bonham, and Jim Porter were all notified. At 11:40 a.m. we phoned John Blauwkamp. He indicated to us that because the spill was less than 10 lbs., the reportable quantity, we would not need to report this spill. This quantity was later confirmed by Dennis Nichols of Environmental Enterprises Inc.

Environmental Enterprises was contacted prior to 12:30 p.m. on May 8, 1989, to arrange clean-up of the spill. The two men from Environmental Ent. Inc. arrived at Menasha at 12:05 p.m. on May 9, 1989, and completed clean-up of the area by 1:05 p.m. The clean-up was completed in the following manner.

- 1. The drain plug was tightened.
- 2. All dust and loose material was cleaned in a 3' x 4' area beneath the transformer.
- 3. They then used sorbant pads and solvent to clean-up the spill and the rest of the area beneath the transformer.
- 4. All cleaning materials, dirt, etc. used in the cleaning process were placed in a label PCB salvage drum.

The transformer in questions was again check at 2:45 p.m. May 10, 1989, about 24 hours after cleaning. There was no evidence of a leak at this time. The unit will be checked weekly for the next four weeks.

dm

cc: K. Kling

J. Blauwkamp

J. Porter

quarter 2<sup>nd</sup> from Mo. Feb to MAY 1989

LOCATION	SERIAL NO.		KVA	GAL. FLUID	FLUID WT.	TYPE	LEAKING		
200122011			AVA	GAL. FLUID	, KG	FLUID	ИО	YES	. COMMENTS
SUB	H883017		1000	192	1133	Pyranol	X		
SuB4	H887289A		150	175	1033	Pyranol	. X		4
SuB4	H887289B	<b>.</b>	750	175	1033	Pyranol		X	Lound a very sleft les
						J			could not measure amount
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DATE \\_/8/89

QUARTER	FROM M	10	TO	•	19

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE	LEAI	KING	COMMENTE
	•		GAL. PEUID	KG	FLUID	ИО	YES	. COMMENTS
Sub4	H887289B	750	175	1033	Pyrano	X		5/10/89 Remspecteda
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		_						
SUB4	HF8 7289B	750	175	1033	Paranol	X		5/14/89 again inspected
					/		<u> </u>	of leak - Sound no leaks
								1 Sary & Kop
54B4	H887289B'	750	175	1033	Pyranul	17		5/24/89. Remojection
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Sub 4	H887289B	758	175	1033	Hyranol	1.X_		Son & Rox
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QUARTER 3 RD FROM MO. MAY TO AUG 1989

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE FLUID	LEAI NO	YES	. COMMENTS
SUB1	H883017	1000	192	1133	PYRANOL	X		
SUB4	H 88 7289A	250	175	1033	PYRANOL	X		
54B4	H887289B.	250	175	1033	PYRANDL		,	
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INSPECTOR .

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DATE 8/7/89

QUARTER 4th FROM MO. Aug to Nov 1989

LOCATION	SERIAL NO.	TOTAL	C11 14112	FLUID WT.	TYPE	LEA	KING	
LOCALION	SERIAL NO.	KVA	GAL. FLUID	KG	TYPE FLUID	МО	YES	. COMMENTS
SuB4	H887289A	750	175	1033	PYRANOL	X		·
SUB4	H887289B	750	175	1033	PYRANOL	. X		
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INSPECTOR Lay & Kop

DATE 9 Nov 89

# GENERAL 8 ELECTRIC

CLEVELAND APPARATUS SERVICE SHOP • APPARATUS AND ENGINEERING SERVICES
GENERAL ELECTRIC COMPANY • 4477 EAST 49TH STREET • CLEVELAND, OHIO 44125
ANY HOUR REPAIR SERVICE .. NIGHTS, SUNDAYS AND HOLIDAYS . Phone (216) 883-1000

MENASHA PAPER CO. 320 NORTH FAIMER ST., P.O. BOX 155 OTSEGO, MICHIGAN 49078 ATIN: ROBERT V. GULBRANSON

#### Gentlemen:

Attached please find your Generator copy of Manifest #01427 for PCB materials received and signed for the Treatment Storage or Disposal Facility (TSDF), dated September 6, 1989.

Certificates of disposal will be forwarded as soon as received from the TSDF. Thank you for the opportunity to be of service, if you have any questions please call us at (216)883-1000 ext. 246.

Yours very truly,

(1) Double

Paul T. Bender

PCB Facility Supervisor

MICHIGAN DEPARTMENTS OF NATURAL RESOURCES

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NA AT 1800 292 4706 OR OUT OF STATE AT 517 373 7660 AND THE NATIONAL RESPONSE

WUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHY 800-424 8802 24 HOURS PER DAY

EPA Form 8700-22 (Rev. 9/88)

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1969

MEN01034

Failure to 1 section 291 h Act 136 PA 1969

Form Approved OMB No 2050 0039 Expires 9-30-91

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To be mailed by

Michigan DNR

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"O: Gary Roys

DATE: August 30. 1989

SUBJECT: PCB Disposal (Sub #1)

FROM: R V Gulbranson Engineering Supt

As you know we will be removing the 1000 KVA transformer in Sub #1 on the Labor Day shutdown and disposing of it

I have included a flier from the General Electric PCB decommissioning facility in Cleveland, Ohio; they will be doing the work. Your contact for questions is Paul Bender at the number on the sheet.

Work is scheduled to commence at 7:00 a.m. on Labor Day, and be completed by 6:00 p.m. that same day. There will be four people here from General Electric, three electricians from Newkirk Electric and four riggers from Gelock Heavy Haulers.

The PCB's will be drained into special barrels and transported to the Cleveland facility for storage until such time as a sufficient quantity is transported to an approved incinerator facility for burning.

The transformer carcass will be transported to Cleveland where it will be flushed with a proper solvent, and then landfilled at an appropriate site. This will probably be at Beatty, Nevada.

Appropriate paperwork will be furnished to us by General Electric as required. I will ask that all records of disposal be sent to you.

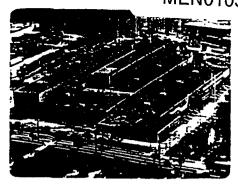
If you have any questions, please let me know or call Paul Bender directly

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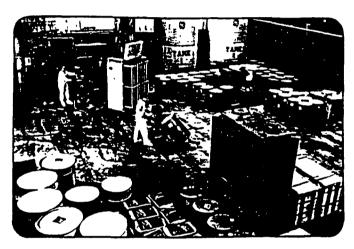
c Steve Brownell John Bonham Ron Van Noord Project File



# A PCB Decommissioning Facility at the Cleveland Service Shop



General Electric's Cleveland Service Shop has established a PCB (Polychlorinated Biphenyl) Decommissioning Facility. This in-shop Decommissioning Facility coupled with our on-site PCB services provides complete, professional services for PCB retrofits, retrofills and direct disposals.



## Facility

Layout of the facility separates the PCB Decommissioning area from other shop equipment. Bulk storage tanks are used to reduce cumbersome drum handling procedures. A sealed floor provides impervious protection for possible spills.

# Protective Clothing mu Deciai Equipment

Protective clothing and special equipment, such as large spill pans, are precautions exercised to reduce the risk of a spill or any skin contact with PCB materials.



# ANI

### Jansformer Decemmissioning

PCB liquids from transformers are drained into bulk storage tanks, and units are then flushed and prepared for landfill disposal. A specially designed flush system is used to minimize fluid handling and decrease the risk of any fluid leaks.

# Disposal of PCB equipment and fluids are completed in compliance with EPA regulations

# Preparation for Dispusai

Flushed units are then prepared for transport to an EPA approved landfill site. Radiators removed from transformers (if required) and capacitors are safely boxed for disposal.



PCB liquids are destroyed, utilizing our General Electric owned incinerator or other EPA approved incinerators.



# Record Keeping

Requirements of the Federal regulations dictate accountability for every transformer carcass and kilogram of liquid. Careful manual and computer records are kept to assure proper traceability.

Administrators are able to provide firm priced quotations and disposal consultation to assist you in meeting your disposal requirements.

The Cleveland Decommissioning Facility can provide complete PCB Services. From initial PCB plant survey, to disposal, to lawful record keeping, our Facility is your one stop for PCB removal. Backed by GE indemnification provisions, our quotations are complete, understandable, and provide a firm price.

For additional information on General Electric PCB Services call (216) 883-1000.

CALL: PAUL BENDER



CLEVELAND APPARATUS SERVICE SHOP 4477 EAST 49TH STREET • CLEVELAND. OHIO 44125



Cleveland Apparatus Service General Electric Company 4477 E. 49th St., Cleveland, OH 44125

Dial Comm:

MENASHA PAPER CO.
320 NORTH FARMER ST., PO BOX 155
OTSEGO, MICHIGAN 49078
ATTN: ROBERT B. GULBRANSON

Subject: Certificate of Disposal

#### Gentlemen:

Enclosed please find your certificates of disposal for the PCB materials received by us on manifest document number 01427 (dated 09-06-89). Thank you for the opportunity to be of service. If you have any questions please call us at (216)883-1000 ext. 246.

Yours very truly,

Paul T. Bender

PCB Facility Supervisor



GE Industrial & Power Systems

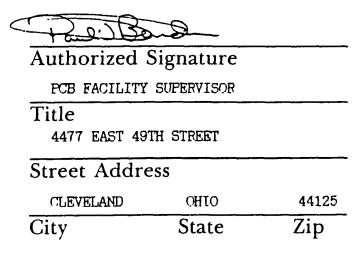
# Certificate of Disposal

General Electric Company certifies
that all material received from
MENASHA PAPER CO.
described on

Manifest Number \_\_\_\_\_\_01427 Dated \_\_\_\_\_\_ was disposed of at the following **Disposal Sites:** 

TRANSFORMER DISPOSED AT: ENVIROSAFE SERVICES OF IDAHO 10 1/2 MILES, NW, GRANDVIEW, IDAHO 63624

EPA ID NUMBER: LDD073114654 MANIFEST DOCUMENT NUMBER: 01443



QUARTER \_\_\_\_\_ FROM MO. \_\_\_\_\_ TO \_\_\_\_ 19\_\_

LOCATION	•	KVA	GAL. FLUID	FLUID WT. KG	TYPE FLUID	LEA!	YES	. COMMENTS
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DATE 1/3//89



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SIGNATURE:	Gari Duce
TITLE:	INVENTORY CONTROL COORDINATOR
DATE:	10/23/63
REFERENCE NO.	4985

OCT 3 0 1989

GENERAL ELECTRIC APPARATUS
SERVICE
CLEVELAND, ONIO 44125

To: JOHN Blauwkamp From GARY Roys Subject Otsoge Paperboard PCB Annual Report For 1990

5/91

Attached Find our quarterly PCB inspection reports and a map snowing the locations of PCB transformers

attached are copies of manifests for the removal of the last two PCB transformers. In the mill. These were located in Sub4. Also encto attached are the exertificate of destruction.

An 80 gallon drum of PCB Flarescent light ballasts were sent out for disposal. Find the manifests for transporation attached.

ce/ Keithkling

QUARTER 15T FROM MO. Nov89 to Feb 1990

LOCATION	SERIAL NO.	WILL	CAI THUT	FLUID WT.	TYPE	LEAKING		
LOCALION			GAL. FLUID	KG	FLUID	ИО	YES	COMMENTS
SuB4	H887289A	750	175	1033	Pyranol	X		
SUB4	H887,289B	750	175	1033	Pyranol	X		
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DATE 20 Feb 90

QUARTER 200 FROM MO. Est 40 May 1995

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE			. COMMENTS
	•	1		.80	FLUID	NO	YES	, contacts
Sub4	H887289A	750	175	1033	Pyranol	X		
Sub4	H 887289A H 887289B	750	175	1033	Pyranol	X		
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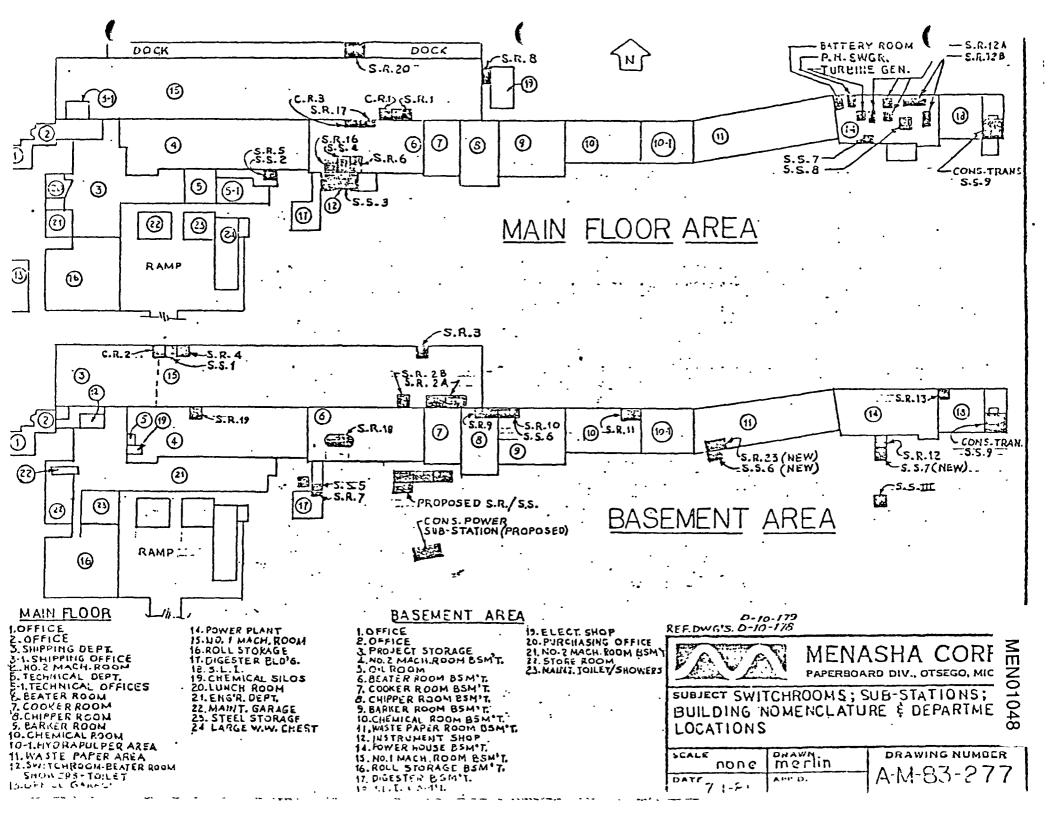
INSPECTOR Sas Exp

DATE 41 May 90

QUARTER 3RD FROM MO. May TO Aug 1990

LOCATION	SERIAL NO.	KVA	GAL. FLUID	FLUID WT.	TYPE FLUID	LEAR		. COMMENTS
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SUB4	H887289B	750	175	1033	PYRANUL	. /		
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SPO				B. State Generator's ID								
L RE		4. Generator's Phone (616) 6926141  5. Transporter 1 Company Name  6. US EPAID Number  C. State Transporter's 1										
NO.			C. State Transporter's ID	0075								
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9		9. Designated Facility Name and Site Address 10.	US EPA ID Number	G. State Facility's ID	***							
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5		of RCRA, I also certify that I have a program in place to reduce the volume ble and I have selected the method of treatment, storage or disposal curr	and toxicity of waste generated to the	degree I have determined to be e	conomically practica-							
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1 1	20. Facility Owner of	or Operator: Ca	ertification of	receipt of haz	ardous materials cov	ered by this	manifest e	xcept a	s noted i	n item 19	).	Date
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**CWM CHEMICAL SERVICES** 

11700 S. Stony Island Ave Chicago, IL 60617

EPA ID #ILD000672121 ILL. ID #0316000058 04/17/91

CERTIFICATE Nº 13008



# **Certificate of Destruction**

	I Services, Inc. h	•	es that waste					
as identified or	n manifest numb	per	<u> </u>					
received@2/14/5	has beer	been incinerated and therel						
destroyed as o	of this	26th	day					
of	19 <sub></sub>	•						
ment is true, accu document for which the company offici	t the information contain rate, and complete. As h I cannot personally ve al having supervisory re rect instructions, made to nd complete."	s to the identified s rify truth and accur esponsibility for the	sections of this racy, I certify as e persons who,					
Generatoм <u>=NASHA</u> СПЕ	NO 11 ARDES							
Address 320 N. FAR	MER ST.	< -						
OTSE <u>GO</u>	MI 49078 E	DOUGLE SHER	<u> </u>					
Contact KEIIH PLING	т	OFFRATIONS M	A/CAGE P					



DATE: 5/4/41

TO: Keith Kling

FROM: MARGUERITE RUMINSKI

Keik-

Per your request, unclosed is a copy of reanifest # 4001187. Ohis should offset your cutificate of disposal.

Please let me know if you need anything else.

Wargueite

#### UNIFORM HAZARDOUS WASTE MANIFEST

#### CONTINUATION OF SECTION 15

GENERATORS NAME: Menasha Paper Co.	MANIFEST #: 61763
AND ADDRESS: 320 North Farmer ST.	EPA ID NUMBER:
OSTEGA, MI 49078	MID006012405
Contact: Steve Brownell	PHONE #: (616) 692-6141

ITEM 11 a,b,c,d	SERIAL # OR ID #	OUT OF SERVICE DATE FOR DISPOSAL	PCB WEIGHT IN KILOGRAMS	PCB WASTE CODE	REMARKS
a	Portable TANK	9-4-90	1021	PGZ	300 gallons TRANSFORMEROIL SO gallons
6	Drum #1	9.4-90	170	PUBZ	50 gallons TRANSFORMEROIL
-c	Drum#1 Drum#2 DEC	9-7-90		PUBL	SALD WASTE
			•		

INSTRUCTION: <u>Item 11</u> Represents the US DOT Description.

<u>PCB Waste Code:</u> PCB 1 for PCB Articles (Transformers, Switches, Capacitors

<u>PCB 2</u> for Containers (Drums of Solid Waste, Drums of Liquids).

Page 2 of 2

GE Cleveland ASD PCB Form 8700-22 con't.



Cieveland Apparatus Service General Electric Company 4477 E. 49th St., Cleveland, OH 44125

(216) 883-1000

MENASHA PAPER CO. 320 NORTH FARMER ST. OSTEGO, MICHIGAN 49078

ATTN: STEVE A. BROWNELL

Subject: Generators Manifest Copy.

#### Gentlemen:

Attached please find your Generator copy of manifest #01763 for PCB materials received and signed for the Treatment Storage or Disposal Facility (TSDF), dated 09-05-90.

Certificates of disposal will be forwarded as soon as received from the TSDF. Thank you for the opportunity to be of service, if you have any questions please call us at (216)883-1000 ext. 246.

Yours very truly,

Paul T. Bender

PCB Facility Supervisor





Cleveland Apparatus Service General Electric Company 4477 E. 49th St., Cleveland, OH 44125

(216) 883-1000

MENASHA PAPER CO. 320 NORTH FARMER STREET OSTEGO, MICHIGAN 49078 ATTN: STEVE A. BROWNELL

Subject: Certificate of Compliance

Gentlemen:

The General Electric Co., EPA ID # OHD004527008, the material received from:

Manifest Number: 01762

MENASHA PAPER COMPANY 320 NORTH FARMER STREET OSTEGO, MICHIGAN 49078

DRUMS ON 09-05-90

Were Disposed of at:
U.S. POLLUTION CONTROL, INC.
3 MILES EAST, 7 MILES NORTH, OFF I-80, EXIT 41
GRASSEY MOUNTAIN, UTAH
EPA IDENTIFICATION NUMBER: UTD991301748
MANIFEST DOCUMENT NUMBER: 01847

Thank you for the opportunity to be of service. If you have any questions please call us at (216)883-1000 ext. 246.

Yours very truly,

Paul T. Bender

PCB Facility Supervisor Cleveland Service Center





Cleveland Apparatus Service General Electric Company 4477 E. 49th St., Cleveland, OH 44125

(216) 883-1000

MENASHA BAPER CO. 320 NORTH FARMER STREET OSTEGO, MICHIGAN 49076 ATTN: STEVE A. BROWNELL

Subject: Certificate of Compliance

Gentlemen:

The General Electric Co., EPA ID # OHD004527008, the material received from:

Manifest Number: 01762

MENASHA PAPER CO. 320 NORTH FARMER STREET OSTEGO, MICHIGAN 49076

TRANSFORMERS ON 09-05-90

Were Disposed of at:
U.S. POLLUTION CONTROL, INC.
3 MILES EAST, 7 MILES NORTH, OFF I-80, EXIT 41
GRASSEY MOUNTAIN, UTAH
EPA IDENTIFICATION NUMBER: UTD991301748
MANIFEST DOCUMENT NUMBER: 01771

Thank you for the opportunity to be of service. If you have any questions please call us at (216)883-1000 ext. 246.

Yours very truly,

Paul T. Bender

PCB Facility Supervisor Cleveland Service Center

USPCI - Grassy Mountain Facility EPA ID # UTD991301748 3 Miles East 7 Miles North of Knolls, UT Exit 41 on I-80

#### CERTIFICATE OF DISPOSAL

As required by 40 CFR 761.218 (a), we are providing this Certificate of disposal to GENERAL ELECTRIC COMPANY to confirm that load # 21624

GB-90-0003 (B) PCB CONTAMINATED SOIL/DEBRIS/RAGS

shipped on manifest number OHD004527008-01847

was/were disposed in Cell X, an EPA approved chemical waste

landfill on 11/05/90.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

General Manager

Cert. # 90-7304

USPCI - Grassy Mountain Facility EPA ID # UTD991301748 3 Miles East 7 Miles North of Knolls, UT Exit 41 on I-80

#### CERTIFICATE OF DISPOSAL

As required by 40 CFR 761.218 (a), we are providing this Certificate of disposal to GENERAL ELECTRIC COMPANY to confirm that load # 21624

GB-90-0003 (A) PCB CONTAM. DEBRIS/ROLL OFF BOX

shipped on manifest number OHD004527008-01847

was/were disposed in Cell Y, an EPA approved chemical waste landfill on 11/05/90.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

General Manager

Cert. # 90-7303

USPCI - Grassy Mountain Facility EPA ID # UTD991301748 3 Miles East 7 Miles North of Knolls, UT Exit 41 on I-80

#### CERTIFICATE OF DISPOSAL

As required by 40 CFR 761.218 (a), we are providing this Certificate of disposal to GENERAL ELECTRIC COMPANY to confirm that load # 17826

GB-89-0463 (A) FLUSHED TRANSFORMERS

shipped on manifest number OHD004527008-01771 was/were disposed in **Cell Y**, an EPA approved chemical waste landfill on O9/13/90.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Wellia //

Cert. # 90-5347

1990

CINCLE SINVICE
CLASSICILID 44125



#### P.O. Box 609, Deer Park, TX 77536, 713/930-2300, FAX 713/930-2316

OCTOBER 25, 1989

GENERAL ELECTRIC COMPANY 4477 EAST 49TH STREET CLEVELAND, OH 44125

ATTN: Mr. Paul Bender

Dear Mr. Bender:

This is to certify the material referenced below was incinerated as of 10/18/89 at our Deer Park facility - Rollins Environmental Services (TX) Inc., P. O. Box 609, Deer Park, Texas 77536 in accordance with 40 CFR 761 as it pertains to incineration of PCB solids, liquids, and capacitors.

TOTAL POUNDS

-39580

H. O. NUMBER

-26242-38

DATE RECEIVED

-10/07/89

RES (TX) INC. B/L NUMBER

-111767

RES (TX) INVOICE NUMBER

-10013247

TWC MANIFEST NUMBER

-00123077

SINCERELY,

RES (IX) INC.

LYNN DEWEY

SENIOR PCB SUPERVISOR

cc: Stephen McGee

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Destruction.





Cleveland Apparatus Service General Electric Company 4477 E. 49th St., Cleveland, OH 44125

(216) 883-1000

MENASHA PAPER CO. 320 NORTH FARMER ST., PO BOX 155 OTSEGO, MICHIGAN 49078 ATTN: ROBERT V. GULBRANSON

Subject: Certificate of Compliance

#### Gentlemen:

The General Electric Co., EPA ID # OHD004527008, the material received from:

Manifest Number: 01427

MENASHA PAPER 320 NORTH FARMER ST., PO BOX 155 OTSEGO, MICHIGAN 49078

LIQUIDS on 09-06-89

#### Were Disposed of at:

ROLLINS ENVIRONMENTALSERVICES
P.O. BOX 609-2027 BATTLEGROUND ROADDEER PARK,
TEXAS 77536EPA ID NUMBER: TXD055141378
MANIFEST DOCUMENT #: 01446
TX STATE #: 00123077

Thank you for the opportunity to be of service. If you have any questions please call us at (216)883-1000 ext. 246.

Yours very truly,

Paul T. Bender

PCB Facility Supervisor Cleveland Service Center

GAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE

.S MUST BE REPUBLIED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN AT 1-400-424-8802 24 HOURS PER DAY.

# MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO	NOT WRITE	IN	THIS	SPACE
	DIS. 🗆		REJ.	

Re*c* 197 19€ MEN01062

Fair section 299.548 MCL or Section 10 of Act 136, PA 1969

OF NATURAL RESOURCES ATT.	DIS. 🗆 R	EJ. 🗌	PR. 🗆		
ase print or type					2050-0039 Expires 9-30-91
UNIFORM HAZARDOUS 1. Generator's US EP WASTE MANIFEST 1. D 0 0 6 0		anifest Ingent N2	2 Page 1 of <b>2</b>	informations not real	on in the shaded areas equired by Federal
3. Generator's Name and Mailing Address (1945) A PAPEL	t ob.	<u>-</u>		anifest Doc	ument Number
320 NORTH FAR		,	MI 1	1663.	L76
OSTEGA, MI 49	9078		B. State Go	enerator's I	D
4. Generator's Phone (616 692-6141 5. Transporter 1 Company Name 6.	US EPA ID Numi	har.	<b>A A A A</b>	en de Germania.	NATIONAL SAN
	984775	-			(708)720-0700
7. Transporter 2 Company Name 8.	US EPA ID Numi	<del> </del>	E. State, Tr		
· •	1   1   1   1		F. Transpor		77. 77. 8
Designated Facility Name and Site Address     10.	US EPA ID Numb	ber	G. State F	cility's ID	
CENERAL ELECTRIC CO		× 4	***	(a) (a)	A. J. S. H. W. S. W. S.
CLEVELAND, CHIO 44125 O H	D 0 0 4 5 2 7	a a a	H. Facility		1
land the second	<del></del>	12.Conta	7 7 7	13.	14 I Waste
11. US DOT Description (including Proper Shipping Name, Haz	ard Class, and	No.			Unit No. NA. N/H
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15. Special Handling Instructions and Additional Information	All the state of t	The State of the State of		A TOWNSON	O. C. C.
DIKE AND CONTAIN SPILLS, AVOID SKIN C	CONTACT! GERT	<b>9</b>	41		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this	consignment are fully and	accurately	described above	e by	
proper shipping name and are classified, packed, marked, and labeled, and according to applicable international and national government regulations.	are in all respects in prop	er condition	for transport b	y highway	
If I am a large quantity generator, I certify that I have a program in plat to be economically practicable and that I have selected the practicable	ce to reduce the volume a	ind toxicity	of waste gene	rated to the	degree I have determined
to be economically practicable and that have selected the practicable and future threat to human health and the environment; OR; generation and select the best waste management method that is	if I am a small quantity or	enerator I b	ave made a d	ood faith eff	ort to minimize my waste
generation and select the best waste management method that is	available to the and the	ot i Can an	ora.		Date
Printed/Typed Name	Signature		. /		Month Day Year
Steven A. Brownell	sto a B	mu			19 490
17. Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name	Signature			<del></del>	Date  Month Day   Year
ROLAN (), TROSSEIP		D.	$\mathcal{L}$	2	109191910
18. Transporter 2 Acknowledgement or Receipt of Materials				<del></del>	Date
Printed/Typed Name	Signature			·	Month Day Year
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19. Discrepancy Indication Space	· (		**		j "
10 miles   10 miles			10 - A 1	• .	• • •
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20. Facility Owner or Operator: Certification of receipt of hazardo	ous materials covered	by this ma	inifest excep	t as noted	ın '
Printed/Typed Name		<u></u>	· 		Month Day Year
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	3.	Gene	erator's Name and Mailing Addres	A. State Manifest Document Number											
				320 NORTH FAR OSTEGA, MI 49			мі 1663174								
			rator's Phone (616 692-61	B. State Generator's ID											
	4	Gene	erator's Phone (616 692-61 sporter 1 Company Name	C State Transported to											
	•		ENERAL ELECTRIC CO.	6. O. H. T	US EPA 10 N			C. State Transporter's ID  D. Transporter's Phone 216)883-1000							
	7.		sporter 2 Company Name	7 <u>-1</u> -2	US EPA ID N			E. State Transporter's ID							
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Н	9.	Desig	gnated Facility Name and Site Ad	dress 10.	US EPA ID N	lumber		G. State Facility's ID							
			ENERAL ELECTRIC CO		,										
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	16.	proper	RATOR'S CERTIFICATION: I hereby declare shipping name and are classified, packed, ling to applicable international and national	marked, and labeled, and	consignment are fully are in all respects in	and accurately proper condition	describ	ed above nsport by	by highway						
		161 000	a large quantity generator. I certify that	I have a program in plac	e to reduce the volu	me and toxicity	of was	te gener	ated to th	e degree	e! have	determ	nined		
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TR	17		sporter 1 Acknowledgement of Re	ceipt of Materials								Date			
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;	*		LED MONTONARD		Trid	Mari	ton	-11	7		09	03	92		
P	18		sporter 2 Acknowledgement or Re	ceipt of Materials	Cinnatura						<del></del>	Date			
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۳	19	). Discr	epancy Indication Space		L			······································	·			+			
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ţ	20	). Facil Item	ity Owner or Operator: Certification 19.	of receipt of hazardo	ous materials cover	red by this n	nanifest	except	as note	חו ל		· - <del> </del>			
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ALL ....LS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN h......IIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8502 24 HOURS PER DAY.

## LIGHT BALLAST DISPOSAL POLICY

**DOCUMENT #31** 

memo from
PETE DE ROSSI

OCTOBER 12,1993

DEAR PIEC THE ATTRICHED PACKET OF INFO.

ON PCBS AND LIGHT BACKETS

WAS PUT TOGETHER BY JENNY LANG

AT MY REQUEST.

PLEASE LOOK THIS INFORMATION PLEASE LOOK THIS INFORMATION FILE.

OVER AND RETAIN IT ON FILE.

IF YOUR PLANT HAS FLUCKESCENT

LIGHT FIXTURES INSTALLED BEFORE
LIGHT FIXTURES INSTALLED BEFORE
1980, THIS PACKET WILL BE VERY
PERTINENT TO YOUR OPERATION.

PCBS ARE HIGHLY RESULTED AND MITH GREAT CARE.

CARE.

Octo Notary.



To: All PECs

c. Peter De Rossi John Blauwkamp Dave Prieto October 12, 1993

From: Jenny Lang

Subject: PCB Light Ballast Management

Light Ballasts are the primary electric components of fluorescent light fixtures and are generally located within the fixture under a metal cover plate. The ballast units are generally composed of a transformer to reduce the incoming voltage, a small capacitor (which may contain polychlorinated biphenyls (PCBs)), and possibly a thermal cut-off switch and/or safety fuse. Menasha's PCB management policy governs the disposal of non-leaking capacitors (and thus light ballasts). Please note that the disposal of leaking PCB containing equipment is regulated by federal law and is expected to be managed according to Menasha's PCB management policy.

#### PCB Containing Ballast Identification

Menasha's PCB management policy (supported by WDNR guidance) requires that:

- Ballasts manufactured before January 1, 1979, are assumed to contain PCBs unless identified as non-PCB or the ballast is labeled "Contains no PCBs."
- Ballasts manufactured after January 1, 1979, are assumed to contain no PCBs and may be disposed of as solid waste.

Please refer to the attached document furnished by the Wisconsin Department of Natural Resources (WDNR). This document will help you identify the manufacture date of your ballasts.

#### Disposal of Leaking and Non-Leaking PCB Containing Ballasts:

According Menasha's PCB management policy:

- Disposal of PCB containing ballasts must be completed within twelve months from the "removed from service" date.
- The disposal process may take up to nine months to complete and six to nine months to make all of the arrangements. When possible (e.g., scheduled facility lighting retrofit) disposal arrangements must be made before the ballast is removed from service.
- Disposal of all PCB fluids must be accomplished by incineration.

Please note, incineration may imply:

- Ballast Recycling
  - PCB containing capacitor incinerated
  - petroleum based insulating material land filled
  - remaining metal recycled
- Ballast Incineration
  - entire ballast incinerated

If you suspect any of your ballast's small PCB containing capacitors may be leaking, the entire ballast must be incinerated. Otherwise, ballast recycling is acceptable and is identified as an acceptable option by the WDNR.

#### Storage Requirements for PCB Containing Ballasts

General Requirements For Non-Leaking & Leaking, PCB Containing Ballasts

According to Menasha's PCB management policy:

- Keep Ballasts covered in oil-dry or sawdust. Do not use more than necessary
  as the material must be incinerated along with the capacitors (recycling) and/or
  ballasts.
- Drums must be:
  - stored inside
  - stored in one common area
  - protected from vehicular damage
  - stored on pavement if possible
  - labeled with PCB sticker clearly marked "For Small PCB Capacitors Only"
- Storage area should be marked with PCB label.

Requirements Specific to Non-Leaking, PCB Containing Ballasts

Ballasts should be stored (according to the WDNR) in:

Drums meeting DOT specifications DOT-5, DOT-5B, or DOT-17H

#### Requirements Specific to Leaking, PCB Containing Ballasts

According to the Code of Federal Regulations (CFR):

- Ballasts should be stored in:
  - Drums meeting DOT specifications DOT-5, DOT-5B, or DOT-17C
- According to the Toxic Substance Control Act (TSCA), leaking, PCB containing ballasts can be stored for up to 30 days on site from the date of their removal from service, provided that a notation is attached to the PCB containing ballast or container (containing the ballast(s)) indicating the date the ballast(s) was removed from service.
- Storage area should be marked with PCB label. The size of the label shall be at least 6 inches on each side.
- No item of movable equipment that is used for handling PCBs and PCB ballasts in the storage facilities and that comes in direct contact with PCBs shall be removed from the storage facility area unless it has been decontaminated (CFR §761.79). Contact corporate for details.
- All PCB ballasts and PCB containers in storage shall be checked for leaks at least once every 30 days. Any leaking PCB ballasts and PCB containers and their contents shall be transferred immediately to properly marked, non-leaking containers. Any spilled or leaked materials shall be immediately cleaned up, using sorbents or other adequate means, and the PCB-contaminated materials and residues shall be disposed of in accordance with CFR §761.60(a)(4). Contact corporate if leaking capacitors and/or containers are discovered at your facility.
- PCB ballasts and PCB containers shall be dated on the ballast or container when they are placed in storage. The storage shall be managed so that the PCB ballasts and PCB containers can be located by the date they entered storage. Storage containers shall have a record that includes for each batch of PCBs the quantity of the batch and date the batch was added to the container. The record shall also include the date, quantity, and disposition of any batch of PCBs removed from the container.

#### **Generator Status**

PCBs are not regulated by the Resource Conservation and Recovery Act (RCRA). Thus, storage and disposal of PCB containing Ballasts will not affect certain hazardous waste generator requirements.

#### **Ballast Recyclers and Incinerators**

A list of facilities suitable for PCB processing has been developed by the WDNR (please refer to attached). In addition, I have attached an auditing tool that will help you evaluate the facility of your choice.

#### Industrial Hygiene Concerns

Please refer to the attached complimentary MSDS from the Genium Publishing Corporation for the safe handling of PCBs.

#### What Should I Do If My Light Ballast Leaks?

- 1. If leaking light ballasts are encountered, follow these procedures closely. Remove employees and ventilate the area well. In order to avoid the need for wearing a chemical cartridge respirator equipped with an organic vapor cartridge, do not work with hot PCB-containing materials.
- 2. Turn off the light fixture at the switch and disconnect electricity at the fuse or breaker box (follow lock/out-tag/out procedures). Let the ballast unit cool for 20-30 minutes before proceeding.
- 3. Since PCBs are readily absorbed through the skin, you should wear rubber gloves that will not absorb PCBs (e.g., neoprene, butyl, or nitrile). Further, if you will be working directly under the fixture, consider using additional protective gear such as goggles (or a face shield) and a rubber apron to help guard against possible exposure from further leaking or cleanup activities. Exercise caution to avoid personal contamination (ie., from touching your face with a contaminated glove).
- 4. Remove fluorescent lamps.
- 5. Recheck that the power is off at the fuse or breaker box. Remove the metal cover over the wiring and ballast unit; loosen the ballast unit by taking out the metal screws which hold it to the end of the fixture; cut the electrical wires going to the ballast and remove the ballast. Note: Wire connectors can be used when installing a new ballast.
- 6. Proceed to clean up leaks using the following guidelines:

PCBs that leak onto nonabsorbent surfaces such as table tops and uncarpeted floors should first be cleaned up by wiping with a rag or paper towel or by scraping with a putty knife if hardened. Avoid smearing the PCB around. This would only contaminate a larger area. Surfaces should then be thoroughly cleaned twice using an appropriate solvent or detergent. Only certain solvents are effective in cleaning up spilled PCBs. These include mineral spirits, deodorized kerosene, turpentine, and rubbing alcohol. (Note, however, that some of these solvents can damage certain types of flooring and floor finishes.) Certain detergents containing trisodium phosphate which are readily available at most large groceries and retail home improvement outlets may also be used. However, they should be used only at full strength and applied with a damp rag rather than diluted in a bucket, since the solution in the bucket would become contaminated and could not legally be disposed of in a sewer system. Some other effective detergent products are commercially available at industrial supply companies or other retail home improvement outlets.

For leaks onto absorbent materials such as drapes and carpets, there is no reliable way to clean and decontaminate the material. In the case of rugs and fabrics, the material should be cut away in a six inch radius around the contamination point(s). In areas where foot traffic has spread contamination, the entire carpet should be disposed of. Proper disposal procedures for all such materials are described in the following section. Associated surfaces, such as flooring under contaminated carpeting, should be thoroughly cleaned with a solvent or detergent as previously described.

- 7. Contaminated materials (ballasts, rags, contaminated clothing, gloves, drapes, carpet, etc.) should be packed into crumpled newspapers or other sorbent materials (sawdust, kitty litter, vermiculite, soil, etc.) and packed in a drum approved for PCBs by the Department of Transportation and finally disposed of at an EPA approved site. Menasha Corporation policy warrants incineration of all combustible materials contaminated with PCBs.
- 8. When you are completely through with the cleanup process, and contaminated materials and protective clothing have been packed for disposal, you should wash your hands thoroughly with detergent.
- 9. If possible, continue to ventilate the room for 24 hours before reuse.

This information was put together in large part by regulatory agencies. Some comments have been added by Menasha Corporation for clarification.

#### PCB Management Audit

1.	Will you provide our facility with a manifest?
2.	If I wish to visit your facility, what arrangements are necessary?
3.	Is the entire ballast incinerated?
	If yes, what is the cost to incinerate the ballast as an intact unit?
4.	ls the ballast recycled?
	If yes, where is each part of the ballast destined?
	<ul> <li>PCB containing capacitor</li> <li>petroleum based insulating material</li> <li>remaining ballast material</li> </ul>
	What is the cost for ballasts from standard:
	• 4' fixtures
	• 8' fixtures
5.	Do you provide DOT barrels?
	If so, which type:
	DOT-5 DOT-17H
	DOT-5B DOT-17C
	At what cost?
	DOT-5 DOT-17H
	DOT-5B DOT-17C
6.	If I called today and requested additional DOT barrels, how many days would it take for delivery?
	SIDE 2>

7. Does your company do the actual incineration or recycling?

If no, who does?

If yes, how long has your company been in the ballast incineration and/or recycling business?

- 8. Once our ballasts leave our facility, how long will it be before they reach the recycler or incinerator?
- 9. If they are not directly delivered to the recycler and/or incinerator:
  - Where are they temporarily stored?
  - How long will they be there?
- 10. How much does your company charge for the incineration of oil dry?
- 11. What is your transportation fee?
- 12. How long has your company been in the PCB transporting business?
- 13. If I called today and requested pick-up of my PCB containing ballasts, when would you be able to respond?
- 14. Do you provide PCB labels?

If yes, at what cost?

15. What happens to our barrels?

#### IDENTIFYING FLOURESCENT LIGHT BALLASTS WHICH CONTAIN PCBs

#### ADVANCED TRANSFORMER

- \* Stopped using PCB in 1978/79
- \* Ballasts dated stamped earlier than 1978 should be assummed to contain PCB.
- \* Ballasts which do not contain PCBs will state on the label "No PCB".

#### GENERAL ELECTRIC

- \* Used in all high power factor (HDF) ballasts made between 1953-1979.
- \* Date of manufacture is stamped on ballast using a letter date code.
- \* Changed from PCB to non-PCB during 1977-1978.
- \* HDF ballasts made during 1977-1978 which do not contain PCBs will have a "W" added after the catalogue number.
- \* All ballasts made after 1979 will state "No PCB" on label.

#### JEFFERSON ELECRIC

- \* Stopped using PCB during 1977-1979.
- \* Non-PCB ballasts made during 1977-1979 will be marked with a green dot and possibly marked "No PCB" on label.
- \* Ballasts date stamped prior to 1977 contain PCBs.
- \* Ballasts made after 1979 will be marked "No PCB" on label.

#### UNIVERSAL

- \* Ballasts made prior to January, 1979 contain PCBs.
- \* Ballasts made starting January, 1979 will state "No PCB" on label.

#### GENERAL ELECTRIC DATE CODES

YEAR	MAL	FEB	MAR	APR	MAY	אטע	JUL	AUG	SEP	OCT	NOV	DEC
1953	ик	OK	PK	RK	SK	TK	UK	VK	WK	XK	ΥK	ZK
1954	NL	OL	$\mathtt{PL}$	RL	SL	$\mathtt{TL}$	UL	$\Delta\Gamma$	$\mathtt{WL}$	XL	$\mathtt{YL}$	ZL
1955	$\cdot MM \rightarrow$	OM ·	PM	RM ·	-SM	MT	UM	-VM	-WM	·XX	YM	ZM
1956	NN	ОИ	PN	RN	SN	TN	מט	VN	WN	XИ	YИ	ZN
1957	NP	OP	PP	RP	SP	TP	UΡ	VP	WP	XP	ΥP	ZΡ
1958	NR	or	PR	RR	SR	TR	UR	VR	WR	XR	YR	ZR
1959	NS	os	PS	RS	SS	TS	US	VS	WS	XS	YS	ZS
1960	NT	OT	PT	RT	ST	TT	UT	VT	WT	XT	TY	zr
1961	NV	OV	PV	RV	sv ·	$\mathtt{TV}$	υv	VV	WV	XV	YV	ZV
1962	ИM	OM	P₩	RW	SW	TW	WU	$\nabla W$	WW	XM	ΥW	ZW
1963	ΝХ	OX	PΧ	RX	SX	ΤX	UΧ	VX	WX	XX	ΥX	zx
1964	NХ	OY	PΥ	RY	SY	TY	UΥ	VY	WY	XY	YY	ZY
1965	AA	BA	CA	DA	EA	FA	GA	HA	JA	KA	LA	MA
1966	AB	BB	CB	DB	EB	FB	GB	HB	JВ	KВ	LB	MB
1967	AC	BC	CC	DC	EC	FC	GC	HC	JC	KC	LC	MC
1968	AD	BD	CD	DD	ED	FD	GD	HD.	JD	KD	LD	MD
1969	AΕ	BE	CE	DE	EE	FE	GE	HE	JE	KE	LE	ME
1970	AF	BF	CF	DF	EF	FF	GF	HF	JF	KF	LF	MF
1971	ΑG	BG	CG	DG	EG	FG	GG	HG	JG	KG	LG	MG
1972	AH	BH	CH	DH	EH	FH	GH	HH	JH	KH	LH	MH
1973	λJ	BJ	CJ	M	EJ	FJ	IJ	HJ	JJ	KJ	IJ	MJ
1974	AK	BK	CK	DK	EK	FK	GK	HK	JK	KK	LK	MK
1975	AL	$\mathtt{BL}$	$\mathtt{CL}$	DL	EL	FL	${ t GL}$	$\mathtt{HL}$	JL	$\kappa_{\Gamma}$	$\mathbf{L}\mathbf{L}$	ML
1976	MA	BM	CM	DM	EM	FM	GM	HM	JM	KM	LM	MM
1977	ИA	BN	CN	DN	EN	FN	GИ	HN	ИC	KN	LN	MN
1978	AP	BP	CP	DP	EP	FP	GP	HP	JР	KΡ	LP	MP
1979	AR	BR	CR	DR	ER	FR	GR	HR	JR	KR	LR	MR

#### WDNR Facilities Suitable for PCB Processing

"This list includes those facilities in existence at the time (February 12, 1993) of this memo's preparation. Some facilities may be temporarily unavailable or have an inventory backlog. No information is presented on the operating status of an individual facility and this determination is left to the service user." WDNR

Midwest Electrical Testing and Maintenance 3001 West Lisbon Avenue Milwaukee, WI 53208 (414) 931-0992

Wisconsin Ballast Disposal (contact John Kronshage) S83 W18380 Saturn Dr. Muskego, WI 53150 (414) 679-5099 (shop) (414) 679-2080 (office)

#### MIDWEST

ELECTRICAL TESTING AND MAINTENANCE CO., INC.

5141 NORTH 35TH STREET

MILWAUKEE, WISCONSIN 53209

August 10, 1993



ENGINEERING SERVICES

414-931-0992 414-461-8485 (FAX)

Menasha Corporation P.O. Box 367 Neenah, Wisconsin 54957-0367

Attn: Ms. Jennifer Lang

Re: PCB Ballast Disposal Quot. Nº 93250

We are pleased to submit this proposal to properly dispose of PCB light ballasts per EPA and DNR requirements. Disposal would be by incineration at an EPA authorized incinerator. The fee includes all costs for transportation, documentation, incineration, and disposal. All waste streams and waste profiles are already on file with the incinerator. Attached are flyers outlining the disposal procedure.

#### **BALLAST DISPOSAL PRICES**

1.0 Disposal By Incineration: (Rollins)

1.1	Ballasts from standard 4' fixtures	\$3.57
1.2	Ballasts from standard 8' fixtures	\$4.70
1.3	Specific Ballasts:	
	Jefferson Ele., Dri-Lok Ballasts (4 ft. Fixtures)	\$10.40/Ballast
	Ballasts labeled "Solid Fill" (4 ft. Fixtures)	\$10.40/Ballast
1.4	All other non-standard size ballasts, or very	
	large ballasts	\$2.50 ea. Plus \$3.40/lb of PCB in the ballasts.
1.5	HD Fixtures	\$2.50 ea. Plus \$3.40/lb of PCB in the ballasts.
1.6	Encapsulated ballasts	\$3.75/lb

- 1.7 The cost to incinerate the ballast as an intact unit is \$3.67 per gross pound, (includes the ballasts and shipping container).
- 2.0 Transportation and pick up (Portal to Portal Milwaukee)

\$75/hr

oil dry \$3.67 gross 16

Menasha Corporation Ms. Jennifer Lang

#### 3.0 ADD ON COSTS FOR DATED MATERIAL

- 3.1 If the "removed from service date" of the PCB material received is over 6 months add a cost change of 200%.
- 3.2 If the "removed from service date" of the PCB material received is over 9 months add a cost change of 250%.
- 3.3 If the "removed from service date" of the PCB material received is over 1 year add a cost change of 300%.

There is a \$250.00 minimum billing.

The above prices do not include tax, if applicable.

This proposal is good for 60-days. After 60-days and up to 270 days, any price increase would reflect only the direct increase in costs from the incinerator.

If you have any questions we will be happy to discuss them.

Respectfully,

Dan Marchewka, PCB manager

MIDWEST ELECTRICAL TESTING

## Procedure for disposal of PCB Lighting Ballasts

from . . .

## MIDWEST

ELECTRICAL TESTING & MAINTENANCE CO. INC.

Midwest Electrical Testing is pleased to have developed a very economical procedure for the disposal of PCB lighting ballasts. The PCB capacitor is removed from the ballast and disposed by incineration. The procedure avoids the high cost of incinerating the entire ballast.

The remaining elements of the ballast are recycled (core and shell). The insulating material is disposed of in a non-PCB landfill site. The Wisconsin DNR has reviewed and authorized the procedure.

The service is performed in our facility in a secure environment by qualified personnel. An accurate log is maintained of all the materials brought into the facility. Complete records are kept on all PCB and Non PCB materials Resulting from the Service.

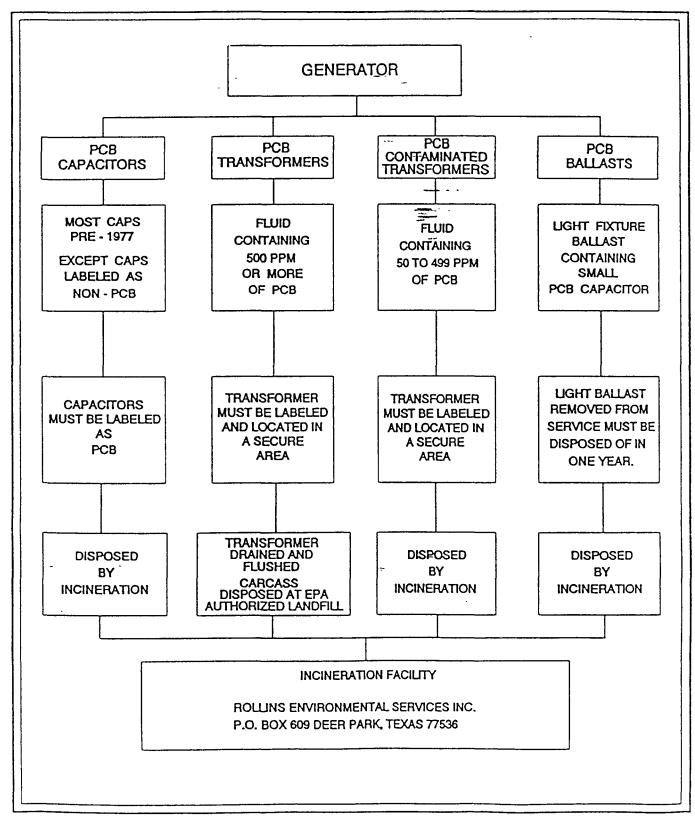
#### PCB SERVICE FACILITY

Midwest Electrical Testing and Maintenance Co., Inc.
3001 West Lisbon Avenue
Milwaukee, Wisconsin 53208
(414) 931-0992
Wisconsin DNR PCB License No. 10860
United States EPA I.D. NO. WID091787325

The following is an enumeration of the disposal procedure:

- 1.0 The customer would collect the ballasts on either pallets or in drums. Midwest Testing would be notified when and where a pickup of the ballast could be made.
- 2.0 Midwest Testing would prepare a Wisconsin Uniform Hazardous Waste Manifest.
- 3.0 Midwest Testing would transport he ballasts to their service facility.
- 4.0 Midwest Testing would remove the PCB capacitors from the ballasts per DNR approved procedure.
- 5.0 All PCB capacitors would be incinerated by Rollins Environmental Services at their Deer Park, Texas incinerator.
- 6.0 All remaining Non PCB materials would be recycled.
- 7.0 All proper documents would be filed.
- 8.0 A Certificate of Destruction would be sent to the Generator

# PCB INFORMATIONAL FLOW CHART



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W1SCONSIN BALLAST INC. W193 S6817 Hillendale Dr. Muskego, Wi. 53150 (414) 679-2080

August 16, 1993

Ms. Jennifer Lang
Menasha Corporation
P.O. Box 367
Neenah, Wi. 54957-0367

Subject: PCB ballast decommissioning / recycling and lamp recycling

Dear Ms. Lang:

Thank you for contacting Wisconsin Ballast Inc. We are proud to propose our service to you in the management of the wastes as a result of your energy saving lighting projects. We propose to decommission the ballasts sending the PCB materials to incineration (at an EPA approved site), and having the steel and copper recycled. The fluorescent lamps will be recycled, with the mercury, glass and aluminum being reused. Our service fits well into the national EPA "Green Lights" program. For those of you who are environmentally conscience we also recycle non-PCB ballasts for a small charge.

You will find a current lamp recycling price sheet, and ballast decommissioning price sheet included. In addition you will also find a copy of our insurance. Pricing to decommission non-PCB ballasts is \$.23 per pound. Here is some information on us:

- 1. We are a recognized Service Facility by the Wisconsin DNR via approval letter dated January 13, 1993. This is for our new location. Our previous approval was dated March of 1989. We are now in our fifth year.
- 2. Our EPA number is WID988632527.
- 3. We are insured.
- 4. When a transporter is required, only DNR approved hazardous waste transporters are used. We are using Superior Environmental Services, Inc. out of Port Washington, WI. Their EPA number is WID982219529.
- 5. All PCB wastes are incinerated at an EPA approved facility.
- 6. The non PCB materials, steel and copper, will be recycled.
- 7. We are a privately held, woman majority owned business.
- 8. We specialize in the disposal of PCBs as found in both lighting ballasts and in small capacitors up to 12 pounds in weight.
- 9. We pride ourselves in providing a quality service of high importance for a reasonable cost. We have been saving customers about two-thirds of their previous costs to have PCB ballasts incinerated

#### <u>WISCONSIN BALLAST INC.</u> <u>W193 S6817 Hillendale Dr.</u> <u>Muskego, Wi. 53150 (414) 679-2080</u>

- 10. We can provide almost a "turnkey" proposal. The only thing that we do not do is place the ballasts in the drum and put the lid on. We can provide drums right to your sites, have the wastes transported, and complete handling for incineration.
- 11. We will even provide a letter as to when the PCBs have actually been incinerated. This is not required, but is something that we do.
- 12. All tracking between us would be done using a Wisconsin Uniform Hazardous Waste Manifest.
- 13. We will supply the manifests and necessary drum labels at no charge.
- 14. Our solid waste transport and storage permit number is WDNR 13083.

If you have any questions, please call me at (414) 679-2080.

Sincerely,

John G. Kronshage, V.P. Sales

The & Krows hay

#### WISCONSIN BALLAST INC. W193 S6817 Hillendale Dr. Muskego, Wi. 53150 (414)679-2080

January 13, 1993

SUBJECT: Wisconsin - Ballast Disposal Pricing (Commercial and Industrial)

PCB's WILL BE DESTROYED BY INCINERATION AT AN EPA APPROVED FACILITY.

A WISCONSIN MANIFEST FORM "MUST" accompany ballasts during transportation and delivery to us.

Current Pricing structure is as follows delivered to us. Pickup available on request at additional charge.

PCB Lighting Ballasts:

Weight (lbs.)	Cost	Type
up to 4.5 lbs. eac	h	Most ballast up to 9" from most 4 ft. fixtures.
up to 499 pieces	\$2.75 ea.	mode 4 ft. Tixtures.
500 plus	\$2.69 ea.	
1500 plus	\$2.63 ea.	
15,000 plus	\$2.55 ea.	
over 4.5 to 8.5 lbs. each	\$ .62 lb. \$5.13 max.	Balance of 4 foot fixtures and some 8' fixtures.
over 8.5 to 12.0 lbs. each	\$ .57 lb. \$6.38 max.	Most 8'instant start and HO fixture ballasts.
Over 12.0 lb. each	\$ .51 lb.	Balance of 8' HO fixtures and VHO fixtures.

Very large projects by separate quote. Payment: 100% with order or upon receipt of ballasts for disposal, or accepted Purchase Order. Net 15 days.

Make checks payable to: Wisconsin Ballast Inc.
W193 S6817 Hillendale Dr.
Muskego, Wi. 53150
(414) 679-2080



#### WORKERS' COMPENSATION

#### Information Page

1. Named Insured and Address:

Agency Name and Number

WISCONSIN BALLAST INC W193 S6817 HILLENDALE DR MUSKEGO, WI 53150

STARR INSURANCE GROUP LTD

2218

Policy Number: CWC-730081-00

Identification Number: FEIN: 391660254

The Named Insured is: CORPORATION

2. Policy Period: Inception 06-19-93 Expiration 06-19-94

12:01 A.M. standard time at the address of the insured stated herein

3. A. Workers' Compensation Insurance: Part One of the policy applies to the Workers' Compensation Law of the states listed here:

Wisconsin

B. Employers' Liability Insurance: Part Two of the policy applies to work in each state listed in Item 3.A. The limits of our liability under Part Two are:

Bodily Injury by Accident	Each Accident	 \$	100,000
Bodily Injury by Disease	Policy Limit		500,000
Bodily Injury by Disease	Each Employee.		100,000

C. Other States Insurance: Part Three of the policy applies to the states, if any, listed here

All states except Nevada, North Dakota, Ohio, Washington, West Virginia and Wyoming and States designated in Item 3 A. above.

D. Endorsements:

Form Number	Form Title	Premium
WC 00 00 00 A(04-92)	Workers' Compensation and Employers' Liability Insurance Policy	
WC 00 04 04 (04-84)	Pending Rate Change Endorsement	
WC 00 04 14 (07-90)	Notification of Change in Ownership Endorsement	
WC 00 04 03 (04-84)	Experience Rating Modification Factor Endorsement .	
WC 48 06 01 A(07-90)	Wisconsin Law Endorsement	
WC 00 03 08 (04-84)	Partners, Officers and Others Exclusion Endorsement	

Page 2

Policy Number: CB-730081

Effective Date:

06-19-93

#### PROPERTY COVERAGES PROVIDED

Form: Deluxe

Coverage Item	Premises Number	Building Number	Valuation Basis	 mit of urance	Automatic Increase Percentage
Business Personal Property Deductible: \$100	001	001	Replacement Cost	\$ 2,500	N/A
Business Personal Property Deductible: \$100	002	001	Replacement Cost	1.500	N/A

#### **DESCRIPTION OF PREMISES**

Premises Number	Building Number	Construction, Occupancy and Location
001	001	FRAME OFFICE W193 S6817 HILLENDALE DR MUSKEGO, WI
002	100	JOISTED MASONRY ELECTRICAL CONTRACTOR S83 W18380 SATURN DR MUSKEGO, WI

#### MORTGAGE HOLDER NAME AND ADDRESS NONE

#### LIABILITY COVERAGES PROVIDED

Coverage Item	Limit of Insurance
Liability and Medical Expenses (Each Occurrence)\$	1.000.000
Medical Expenses (Any One Person)	5.000
Fire Legal Liability (Any One Fire)	50,000
Products-Completed Operations Aggregate Limit	2.000.000
General Aggregate Limit (Other Than Products-Completed Operations)	2.000,000

#### SCHEDULE OF LIABILITY CLASSIFICATIONS

Premises Number	Bullding Number	Classification Description	Class Code	Premium Basis <sup>1</sup>
001	100	Electrical Work - Within Buildings	92478	64.800 PA
002	001	Electrical Work - Within Buildings	92478	Included PA

<sup>1</sup> PA = Payroll - Rate Applies Per \$1,000 of Payroll

October 7, 1993

Ms. Jennifer Lang Menasha Corp. P.O. Box 367 Neenah, WI 54597

#### Dear Jennifer:

Per our conversation regarding respiratory protection for handling PCBs in fluorescent light ballasts, I have enclosed our general recommendations for respirators. Basically it depends on the situation; we can not say respirators are not necessary for handling such small amounts of PCBs because if the area is not properly ventilated or the PCBs are heated, theoretically, it could pose an exposure problem. The vapor pressure of PCB is generally very low unless heated, then evaporation occurs and the PCB condenses as a mist. Well, I hope I've been somewhat helpful. I've also enclosed some information on our MSDS Collection and hotline service. It may be just what you're looking for.

Sincerely,

Marilyn J. Wurth.
Marilyn J. Wurth

#### Section 6. Health Hazard Data

Carcinogenicity: The IARC, (164) and NTP(164) list PCBs as an IARC probable carcinogen toverall evaluation is 2A, limited human data, sufficient animal data) and NTP anucipated carcinogen, respectively. Summary of Risks PCBs are potent liver toxins that can be absorbed through unbroken skin in toxic amounts without immediate pain or uritation PCBs have low acute toxicity, but can accumulate in fatty tissue and severe health effects may develop later. Generally, toxicity increases with a higher chlorine content, PCB-oxides are more toxic. The toxic action on the liver also increases with simultaneous exposure to other liver toxins, e.g. chlorinated solvents, alcohol, and certain drugs. Pathological pregnancies (abnormal pigmentations, abortions, stillburths, and underweight burths) have been associated with increased PCB serum levels in mothers; PCBs can be passed in breast milk. PCBs can affect the reproductive system of adults. Medical Conditions Aggravated by Long-Term Exposure: Skin, liver, and respiratory disease. Target Organs: Skin, liver, eyes, mucous membranes, and respiratory tract. Primary Entry Routes: Inhalation, dermal contact, ingestion. Acute Effects: Exposure to PCB vapor or mist is severely utiliting to the skin, eyes, nose, throat, and upper respiratory tract Intense acute exposure to high concentrations may result in eye, lung, and liver injuly 3/stemic effects include nausea, comiting, increased blood pressure, fatigue, weight loss, jaundice, edema and abdominal pain. Cognitive, neuropel avior and psychomotor impairment and memory loss have also been seen after acute exposure Chronic Effects: Repeated exposure to PCBs can cause chloroacne; redness, swelling, dryness, thickening and darkening of the skin and nails; swelling and burning of the eyes, and excessive eye discharge; distinctive hair follicles; gastrointestinal disturbances; neurological symptoms including headache, dizziness, depression, nervousness, numbness of the extremities, and joint and muscle pain; liver enlargement, menstrual changes in women; and chronic bronchius. Cancer, primarily liver, is also a possible result of exposure, but data is inconclusive.

FIRST AID Eyes: Do not allow victim to rub or keep eyes tightly shut. Rinsing eyes with medical oil (olive, mineral) initially may remove PCB and halt irritation better than water rinsing alone. Gently lift eyelids and flush immediately and continuously with flooding amounts of water until transported to an emergency medical facility Consult a physician immediately Skin: Quickly remove contaminated clothing Rinse with flooding amounts of water for at least 15 min. Wash exposed area with soap and water Multiple soap and water washings are necessary. Avoid the use of organic solvents to clean the skin. For reddened or blistered skin, consult a physician, Inhalation: Remove exposed person to fresh air and support breathing as needed. Ingestion: In most cases, accidental PCB ingestion will not be recognized until long after vomiting would be of any value Never give anything by mouth to an unconscious or convulsing person. Vomiting of the pure substance may cause aspiration. Consult a physician Note to Physicians: Monitor patients for increased hepatic enzymes, chloroacne, and eye, gastrointestinal, and neurologic symptoms listed above Diagnostic lests include blood levels of PCBs and altered liver enzymes.

#### Section 7. Spill, Leak, and Disposal Procedures

Splii/Leak: Notify safety personnel, evacuate all unnecessary personnel, provide adequate ventilation, and isolate hazard area. Cleanup personnel should protect against vapor inhalation and skin or eye contact. For small spills, take up with sand or other noncombustible material and place into containers for later disposal. For larger spills, dike far ahead of spill to contain for later disposal. Follow applicable OSHA regulations (29 CFR 1910 (20) Environmental Transport: PCBs have been shown to bio-concentrate significantly in aquatic organisms. Ecotoxicity: Bluegill, TLm 0 278 ppm/96 hr Mallard Duck, LD<sub>50</sub> 2000 ppm. Environmental Degradation: In general, the persistence of PCBs increases with an increase degree of chionnation. Soil Absorption/Mobility: PCBs are tightly absorbed in soil and generally do not leach significantly in most aqueous soil systems. However, in the presence of organic solvents, PCBs may leach rapidly through the soil. Volatilization of PCBs from soil may be slow, but over time may be significant. Disposal: Approved PCB disposal methods include, incineration with scrubbing, high-efficiency boilers, landfills, and EPA-approved alternative disposal methods. Each disposal method has various criteria. Contact your supplier or a licensed contractor for detailed recommendations. Follow applicable Federal, state, and local regulations

**OSHA** Designations

EPA Designations RCRA Hazardous Waste (40 CFR 261 33) Not listed

SARA Extremely Hazardous Substance (40 CFR 355) Not listed

Listed as a SARA Toxic Chemical (40 CFR 372 65)

Listed as a CERCLA Hazardous Substance\* (40 CFR 302 4) Final Reportable Quantity (RQ), 1 lb (0 454 kg) [\* per CWA, Sec. 311(b)(4)

#### Section 8. Special Protection Data

Goggles: Wear protective eyeglasses or chemical safety goggles, per OSHA eye- and face-protection regulations (29 CFR 1910 133) Because contact lens use in industry is controversial, establish your own policy Respirator: Seek professional advice prior to respirator selection and use Follow OSHA respirator regulations (29 CFR 1910 134) and, if necessary, wear a MSHA/NIOSH-approved respirator. Select respirator based on its suitability to provide adequate worker protection for given working conditions, level of airborne contamination, and presence of sufficient oxygen Minimum respiratory protection should include a combination dust-fume-mist and organic vapor cartridge or canister or air-supplied, depending upon the situation. For emergency or nonroutine operations (cleaning spills, reactor vessels, or storage tanks), wear an SCBA. Warning Airpurifying respirators do not protect workers in oxygen-deficient atmospheres. If respirators are used, OSHA requires a written respiratory protection tion program that includes at least medical certification, training, fit-testing, periodic environmental monitoring, maintenance, inspection, cleaning and convenient, sanitary storage areas. Other: Wear chemically protective gloves, boots, aprons, and gauntlets to prevent all skin contact. Buryl rubber, neoprene, Teflon, and fluorocarbon rubber have break through times greater than 8 hrs. Ventilation: Provide general and local exhaust ventilation systems to maintain airborne concentrations below the OSHA PEL (Sec. 2). Local exhaust ventilation is preferred because it prevents contaminant dispersion into the work area by controlling it at its source. (103) Safety Stations: Make available in the work area emergency eyewash stations, safety/quick-drench showers, and washing facilities. Contaminated Equipment: Separate contaminated work clothes from street clothes and launder before reuse. Segregate contaminated clothing in such a manner so that there is no direct contact by laundry personnel. Implement quality assurance to ascertain the completeness of the cleaning procedures. Remove this material from your shoes and clean PPE. Comments: Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, using the toilet, or applying cosmetics

#### Section 9. Special Precautions and Comments

Storage Requirements: Store in a closed, labelled, container in a ventilated area with appropriate air pollution control equipment. Engineering Controls: To reduce potential health hazards, use sufficient dilution or local exhaust ventilation to control airborne contaminants and to maintain concentrations at the lowest practical level. Administrative Controls: Inform employees of the adverse health effects associated with PCBs. Limit access to PCB work areas to authorized personnel. Consider preplacement and periodic medical examinations with emphasis on the skin, liver, lung, and reproductive system. Monitor PCB blood levels. Consider possible effects on the fetus. Keep medical records for the entire length of employment and for the following 30 yrs Transportation Data (49 CFR 172.101)

DOT Shipping Name: Polychlorinated biphenyls DOT Hazard Class: 9 **ID No.: UN2315** 

DOT Packing Group: II DOT Label: CLASS 9

Special Provisions (172,102): 9 N81

Packaging Authorizations a) Exceptions: 173 155

b) Non-bulk Packaging: 173 202 c) Bulk Packaging: 173 241

Quantity Limitations a) Passenger Aircraft or Railcar: 100 L b) Cargo Aircraft Only: 220 L

Vessel Stowage Requirements a) Vessel Stowage: A

Listed as an Air Contaminant (29 CFR 1910.1000, Table Z 1-A)

b) Other: 34

MADA Collection References 26 73 89 10x 101 103 124 126 127 132 133 136 163 164 168 169 174 175 190 Prepared by M. Wurth BS Industrial Hymene Review PAR's MPH CHI Medical Review AC Darlington MD

# PCB TRANSFORMER IN ON-SITE LANDFILL

DOCUMENT #32

E Thomas - 015050

memo CORPORATION

TO:

1 MG 544

Bob Gulbranson - Otsego

DATE: March 31, 1980

SUBJECT:

ELECTRICAL EQUIPMENT

FROM: W. A. Schenck

Dear Bob:

I wanted to confirm the conversation Bruce and I had with you regarding the electrical equipment that was put in the Otsego landfill. It is my understanding that: 1. The size of the unit was 2' X 3' X 5'. 2. It was a capacitor. 3. It would not empty because it was a design which was not drainable. The liquid was taken up by an absorbent material in the container. 4. Estimated 10 to 15 gallons of liquid. 5. It is your judgement the barrel was put in the dump about 1973, which was approximately one year after you joined the company.

If this does not represent the facts, or if you have additional pertinent information, will you please oblige Bruce, and I would ask that he also advise Ernie Manders with the necessary confirming memo.

WAS:pal

t als

ald

DC V Sohn Be. MacDocson -/7-80

NEZ. Ofsong . ) 657 b, PCB Dround water

ナイクない र्वे 花 E L IPC 0 mil.

(the units are parts per billion) Street well if 647 wells. - less than o.1 pg b lede then o. 2 pp b.

 $\bigcirc$ 

water. for .08 Part: Pc: million 7 H Z ļ 80

#### § 761.45

mark, and included this information in firefighting training.

(iv) The Regional Administrator will either approve or disapprove in writing the use of an alternative mark within 30 days of receipt of the documentation of a program.

(3) Any mark placed in accordance with the requirements of this section must be placed in the locations described in paragraph (j)(1) of this section and in a manner that can be easily read by emergency response personnel fighting a fire involving this equipment.

[44 FR 31542, May 31, 1979. Redesignated at 47 FR 19527, May 6, 1982, and amended at 47 FR 37359, Aug. 25, 1982; 50 FR 29201, July 17, 1985; 50 FR 32176, Aug. 9, 1985; 53 FR 12524, Apr. 15, 1988; 53 FR 27329, July 19, 1988]

#### § 761.45 Marking formats.

The following formats shall be used for marking:

(a) Large PCB Mark— $M_L$ . Mark  $M_L$  shall be as shown in Figure 1, letters and striping on a white or yellow background and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The size of the mark shall be at least 15.25 cm (6 inches) on each side. If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 5 cm (2 inches) on each side.

(b) Small PCB Mark— $M_s$ . Mark  $M_s$  shall be as shown in Figure 2, letters and striping on a white or yellow background, and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The mark shall be a rectangle 2.5 by 5 cm (1 inch by 2 inches). If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 1 by 2 cm (.4 by .8 inches).

40 CFR Ch. I (7-1-92 Edition)

## CAUTION CONTAINS PCBs

(Polychlorinated Biphonyls)

A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761—For Disposal Information contact the nearest U.S. E.P.A. Office

In case of accident or spill call roll free the U.S Coast Guard National Response Center 800.424-8802

Also Contact Tel No

Figure 1

#### CAUTION CONTAINS PCBs

(Polychlorinated Biphenyls, FOR PROPER DISPOSAL INFORMATION CONTACT U.S. ENVIRONMENTAL PROTECTION AGENCY

Figure 2

[44 FR 31542, May 31, 1979. Redesignated at 47 FR 19527, May 6, 1982]

#### Subpart D—Storage and Disposal

Note: This subpart does not require removal of PCBs and PCB Items from service and disposal earlier than would normally be the case. However, when PCBs and PCB Items are removed from service and disposed of, disposal must be undertaken in accordance with these regulations. PCBs (including soils and debris) and PCB Items which have been placed in a disposal site are considered to be "in service" for purposes of the applicability of this subpart. This subpart does not require PCBs and PCB Items landfilled prior to February 17, 1978 to be removed for disposal. However, if such PCBs or PCB Items are removed from the disposal site, they must be disposed of in accordance with this subpart. Other subparts are directed to the manufacture, processing, distribution in commerce, and use of PCBs and may result in some cases in disposal at an earlier date than would otherwise occur.



#### THE INSTITUTE OF PAPER CHEMISTRY

January 17, 1980

Post Office Box 1039 Appleton, Wisconsin 54912 Phone: 414/734-9251

Institute File No. 80-70037

Report to

MEN01093

Dr. W. Allan Schenck Vice-President Technical and Environmental Affairs MENASHA CORPORATION P.O. Box 367 Neenah, WI 54956

Samples received on 1/9/80

POLYCHLORINATED BIPHENYL ANALYSIS

- Fort hill, 1

Polychlorinated Biphenyl,

Sample Identification Interpreted as Aroclor 1242

 $\mu g/1$ Interpreted as Aroclor 1254

Interpreted as Aroclor 1260

Menasha Otsego 6-7 Wells,

1-4-80

 $< 0.1^{a}$ 

Menasha Otsego Well on 106th Street, 1-4-80

 $< 0.2^{b}$ 

<sup>a</sup>No Aroclor pattern evident.

bThis sample's chromatogram contained a few large peaks, but they were not PCB's.

Basis of Report: As received.

Method: Method supplied by EPA, as noted in Federal Register 38(199), Part II:

28758-60 (Oct. 16, 1973), modified for use on pulp and paper mill

effluents.

Signed Dwight B. Easty

Group Leader

Analytical Group

Chemical Sciences Division

These tests are performed as a confidential service and cannot be quoted without specific permission of The Institute of Paper Chemistry.

## USED OIL TEST RESULT

**DOCUMENT #33** 



#### Must Be Completed With Material Survey instructions

The Material Survey has been specifically designed to provide Safety-Kleen with information necessary to transport, recycle, treat, store, and/or dispose of your material in full compliance with state and federal regulations.

A separate survey is required for each material. A revised Survey must be submitted whenever: (1) there is a change in the characteristics; of the material or a change in process which might result in change in material characteristics: (2) there is a change in state or federal regulations which change the regulated status of the material or any constituents; or, (3) Safety-Kleen Corp. requests that information be updated. The Survey must be submitted to the appropriate Safety-Kleen laboratory along with a sample and approved through Safety-Kleen's internal review process. No material can be received at any Safety-Kleen facility unless specifically authorized by an approved Survey and Safety-Kleen Prequalification.

A representative quart sample of the material must be submitted with each Survey. Proper sampling methods may be found in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," EPA publication SW-846. The sample must be packaged in a plastic-coated bottle with a teflon-lined lid, labeled and shipped in accordance with the provisions of 40 CFR 261.3 (d)(2) and applicable US DOT and transporter regulations. The label provided with the Survey must be completed, signed and attached to the sample container.

When the Survey is completed, remove the generator copy and keep the Material Survey Instructions for your records. Return the original Survey to the appropriate Safety-Kleen laboratory listed in the Material Survey Instructions.

MAKE SURE THAT LABEL AND SURVEY ARE FILLED OUT CORRECTLY AND LABEL IS APPLIED. TO SAMPLE CONTAINER, SAMPLE CONTAINER MUST BE CLEAN BEFORE APPLYING LABEL. MAKE SURE THAT SAMPLE AND SURVEY ARE SUBMITTED TOGETHER.

ANSWERS MUST BE PROVIDED FOR ALL QUESTIONS AND ITEMS ON THE MATERIAL SURVEY. Print (pen only) or type the answer (or check boxes) so that all pages are legible. If additional information is submitted to complete an answer, indicate on the form that there are attachments (see section E:.

Check The Safety-Kleen Program Which Will Handle The Material.

#### The SK Branches Have The Following Programs:

#### FRS -Fluid Recovery Service PC -Parts Cleaner IC -Immersion Cleaner SKOS -Safety-Kleen Oil Services DC -Dry Cleaner PR -Paint Refinishing QC -Quality Check for Branch products and solvents

Check blank box for other services and explain.

#### SK Envirosystems Has The Following Programs:

SUBSTITUTE FUEL SOLVENT RECOVERY TOLLING OF SOLVENT **PRODUCT** 

-Material for energy recovery as fuel -Solvent recovery and sale to industry -Solvent recovery and return to generator -Quality Check for Envirosystems solvent

#### Other Services Are Offered:

BRES -Breslube USA, Breslube Canada, Petrocon, and Safety-Kleen Oil Services, Inc. have programs for oil recycling ONLY for their sales representatives and customers.

DISP -Safety-Kleen Envirosystems of Puerto Rico has a program of off-site disposal of lab-packs and similar wastes.

TSVC -Safety Kleen Technical Services use only.

For other programs, check blank box and explain.

A steri	Branch Services   FRS   DC   PC   PR   IC   QC   SKOS     Other Services   BRES   DISP	Envirosystems Substitute Fuel Solvent Recovery Tolling of Solvent Product	SK USE ONLY  Control No  Lab No	259978
Α	Generator Name Status S	MO	State _	O No ID ID Intity Generator (CESQG
В	Facility Street Address (No P O Boxes) Manifest Address	Billing Name & Addres	ss (if Different)	Manifest Address
	CITY (111) RY NE State 14 ZIPH 9508	City	State	e Zıp
С	General Description of Material	,	Vol %   Wt %	Max Typical
	Generation Amount    Gais			
	Liquid Viscosity	TOTAL (Typical st	nould not exceed 100	%) 100 %
E	Attach material safety data sheets (MSDS) for material components and any cui  MSDS attached	_	er analysis of the mat Analysis attached	terial  No attachments
F	Cneck all of the following restricted prohibited or special substances which may DOT Corrosives Poisons Radioactives Explosives Oxidizers TSCA regulated materials Chlorinated biphenyls (PCB), Bromin Materials used as pesticides, herbicides, insecticides or m Human carcinogens above exclusion levels as defined by OSHA (R Toxic components with Oral LD50 less than 50 mg/kg or exposure Toxic metals (Arsenic, Barium Beryllium, Cadmium, Chrom Reactive components (Sulfides, Cyanides, Shock sensitive Water- or amine-reactive components (such as unreacted Isocyanat Biological hazards (such as Pathogenic materials, Infectious agent Identify substance and concentration	s, Peroxides Gases or intended biphenyls (PBB), Chaterials which are by-picted 29 CFR 1910 1001-) or limits (OSHA PEL or ACGNUM, Lead, Mercury, Nimaterials, Pyrophoric of the monomers and resins, Acts, Etiologic agents, USEP.	materials forbidder informated dibenzoor oducts of pesticion MSHA Class 1 2 MSHA Class 1 2 Ckel, Selenium, Sompounds Oxidiz Acid chlorides Anhy A Medical Waste, D	dioxins or furans de manufacture or 4 Carcinogens 2 ppm or 8 mg/m³ Gilver, Thallium) ters Peroxides) drides, Epoxides)
G	DOT Hazardous Material Description  Proper Shipping Name	Reportable Quantity (Lb	os)	0 🗆 100 🗀 10 🗀 1
	Hazard Class Number I	P G Not Do	OT Hazardous Materia	al Not sure
	K USE ONLY Accepted for Analysis Accepted Conditionally omments	Suspended for More I	nformation 🔲 Re	ejected
_		Safety Evaluated By	Date	

MEN01097

H EPA Waste Description and Treatment Standards (COMPLETE ALL QUESTIONS WITHIN ONE SECTION).
IS THIS MATERIAL A RORA "HAZARDOUS WASTE"? IRET 40 OFR 26" CHECK ONE 259978
For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes:
☐ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005 ★ ☐ F006 ☐ K086 Other, specify ☐ Not Applicable
* For F005 wastes, is waste "listed" due to spent solvents 2-ethoxyethanol (ethylene glycol ethyl ether) or 2-nitropropane?  \Bigcup Yes \Bigcup No
For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes. (See Reference Table on back page)
D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011
S Based on Land Disposal Restrictions, does waste have a technology-based treatment standard? (Ref. 40 CFR 268)  Not sure Yes No
If yes, then show all applicable technology codes:   DEACT RORGS FSUBS INCIN Other, specify
1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste")? (Ref. 40 CFR 261)
2. Is this waste an "used oil" (used petroleum oil) for fuel or recovery, not disposal? (Ref. 40 CFR 266 Subpart E)
3. Is this waste exempt from regulation as a hazardous waste? If yes, explain why in Comments.
4. For all other "non-hazardous" wastes, submit survey with Toxicity Characteristic Leaching Procedure (TCLP) analysis results. If TCLP analysis is not available, then contact a Safety-Kleen representative about obtaining this analysis.
5. All generators of unregulated material, "used oil", exempt waste, or "non-hazardous" waste must sign this statement:
Generator warrants and represents that the materials provided Safety-Kleen Corp. and its subsidiaries hereunder are not RCRA hazardous wastes and have not been mixed, combined, or otherwise blended in any quantity with materials defined as a hazardous waste under 40 CFR Part 261.
Signature X Date ///77
6. List all applicable State Waste Codes required by generating facility state:
Show SK Codes for all regulated chemicals listed in the Reference Table on the back page which can be present in material, even in trace amounts.
NOT Done present D Not sure
CUET
Are any of these chemicals used as solvents? Yes No Are these solvents used to remove oil, grease, or wax? Yes No
Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No.
Type of sample: Grab Tank Composite of drums Sample taken by Customer Safety-Kleen Representative
Generator Certification (Not a waste handling agreement):
On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this document is true, accurate, and
complete; all known or suspected hazards have been disclosed; and, I am an employee and duly authorized representative of the Generator.
Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any claims, liabilities, damages, and costs
including, but not limited to, attorney's fees, arising out of or in any way related to breach of the above warranty by the Generator.
Name LEN E MYERS Title FAMILY
Signature X Phone (6/2) - 175-076 5
Comments
HELK FUN DRUS
Sales Representative Name Number Branch No. 5-061-01
SK USE ONLY Sample leaked in transit Survey number did not match sample label Survey information incomplete
Sample Received Completed Survey Received Survey Logged
Comments
Analysis Entered By Date Date Data Verified By Date

COMMON CHEMICAL NAME	OTHER NAMES & USES	WASTE CODES		SK CODES	
'-CHLORINATED SOLVENTS					
<b>→</b> yne	Thinner, Paint		F003	ACE	
Benzene *	Gasoline, Petroleum products	D018	F005	BENZ	
Butyl Alcohol, iso-	isobutanol, 2-methylpropanol		F005	IBA	
Butyl Alcohol, n-	1-Butanol		F003	NBA	
Carbon Disulfide *	Laboratory solvent		F005	CS2	
Cresol, meta- *	Cresylic acid	D024	F004	CSLM	
Cresol, ortho- *	Cresylic acid	D023	F004	CSLO	
Cresol, para- *	Cresylic acid	D025	F004	CSLP	
• •	Cresylic acid. Cold Parts Cleaner. Enamels	D025	F004		
Cresols (mixture) *	Cyclohexyl Ketone, Ink solvent	5020	F004	CSLS	
Cyclohexanone	Cyclonexyr Retorie, Ilik Solveni	D000	P003	CHK	
Dinitrotoluene, 2, 4- *	A cate and athul arter	D030	F000	DNT	
Ethyl Acetate	Acetic acid ethyl ester		F003	ETAC	
Ethyl Ether *	Laboratory solvent		F003	ETE	
Ethylbenzene	Part of commercial xylenes		F003	ETB	
Ethylene Glycol Ethyl Ether *	2-Ethoxyethanol, Glycol Ether EE, Paint		F005	EGEE	
Methanol	Methyl alcohol, Wood alcohol		F003	MEOH	
Methyl Ethyl Ketone	2-Butanone, MEK, Paint, Thinner	D035	F005	MEK	
Methyl Isobutyl Ketone	MIBK, Thinner, Paint		F003	MIBK	
Nitrobenzene *		D036	F004	NB	
Nitropropane, 2- *	Paint		F005	NP2	
Pyridine *	Laboratory solvent	D038	F005	PYR	
•	Thinner, Paint, Glue	5000	F005		
Toluene Yviene	Dimethylbenzenes, Thinner, Paint		F003	TOL	
Xylene	Dimenty Denzenes, Thinner, Faint		F003	XYLS	
CHLORINATED SOLVENTS					
Carbon Tetrachloride *		D019	F001	CCL4	
Chlorinated Fluorocarbon *	Freon, CFC, Racon		F002	CFC	
Chlorobenzene	Monochlorobenzene	D021	F002		
			F002	MCB	
Chloroform *	Laboratory solvent	D022		CHCL	
Dichlorobenzene, ortho-	1, 2-Dichlorobenzene, ODCB		F002	ODCB	
Ethylene Dichloride *	1, 2-Dichloroethane, Laboratory solvent	D028		EDC	
Methylene Chloride *	Dichloromethane, Paint stripper		F001/2	MECL	
chloroethylene	Tetrachioroethylene, "Perc". Dry Cleaning	D039	F001/2	PERC	
loroethane, 1, 1, 1-	Methyl Chloroform, "Trichlor", Degreasing		F001/2	111	
nloroethane 1, 1, 2- *	•		F002	112	
Trichloroethylene	Trichloroethene, "Trichlor", Degreasing	D040	F001/2	TCE	
Trichlorofluoromethane *	MF, CFC 11, Blowing agent, Refrigerant	5040	F001/2		
Trichlorotrifluoroethane	TF, CFC 113, Solvent F, Degreasing			FMF	
OTHER CHLORINATED COMPOUNDS	1F, CFC 113, Solvent F, Degreasing		F001/2	FTF	
Chlorinated Biphenyls *	PCB, Transformer Fluid, Capacitors		TSCA	PCB	
Dichlorobenzene, para-	1, 4-Dichlorobenzene, Component of ODCB	D027		PDCB	
Hexachlorobenzene	1, 4 Digition Delization Company of	D032		HCB	
Hexachlorobutadiene *		D032			
Hexachloroethane *				HCBD	
Trichtorophenol, 2, 4, 5-		D034		HCE	
Trichlorophenol, 2, 4, 6-		D041		TCP5	
Vinyl Chloride *		D042		TCP6	
Vinylidene Dichloride *	Monomer	D043		VC	
•	1, 1-Dichloroethene, Monomer, 111 impurity	D029		VDC	
METALS *					
Arsenic *	Mary days at the second	5004			
Barium *	Wood treatment	D004		AS	
Cadmium *	Pigment	D005		BA	
Chromium III *	Pigment	D006		CD	
	Pigment	D007		CR3	
Chromium VI *	Chromate, Pigment	D007		CR6	
Lead *	Solder, Lead Batteries	D008		PB	
Mercury *	00.001, 2000 -0.00	D009		MERC	
Nickel *	Charl	D003	CALL		
Selenium *	Steel	5010	CA List	Ni	
Silver *		D010		SE	
		D011		AG	
Thallium *			CA List	TL	
PESTICIDES *					
Acetic Acid, (2, 4-Dichlorophenoxy)- *	0.45	Daca		B4.	
	2, 4-D	D016		D24	
Chlordane *	Termite Control	D020		CLDN	
ু⁵in ≭		D012		EDRN	
tachlor (and its hydroxide) *		D031		HPTC	
indane *	Benzene Hexachloride, BHC	D013		LNDN	
Methoxychior *		D014		MTXC	
Pentachiorophenoi *	"Penta", PCP, Wood Treatment	D037			
	2. 4. 5-TP	D037		PCP	
		1 31 1 3 /		SLVX	
Silvex * Toxaphene *	2. 4. 5-15	D015		TXPN	

PROJECT: PREQUALIFICATION BRANCH/SUBMITTER: 506101

30918 - R2271 (RUN 05.21,92) PREQUALIFICATION EVALUATION - BRANCH INDUSTRIAL SERVICES GENERATOR SURVEY

COMPLETEL. REVISED:

05/21/92

MEN01099

4-10

ACCEPT

GRAND RAPIDS

ACCEPT

JID RECOVERY SERVICES

MENASHA

WASTE OILS HYD OIL

LAB #: 0000011411-5 SURVEY #: 0000259972

CONTROL #: 0000138890-4

SUSTOMER INFORMATION 5081 OF 4039

FEDERAL EPA ID: MIDOUBO1240B STATE EPA ID: 9280058042

PH RANGE :

MENASHA CORP KEITH KLING N FARMER ST OTSEGO

MI 49078

ATTN: LEN E MYERS

BRANCH: 506101 - GRAND RAPIDS

GENERATOR: MENASHA NATURE OF BUSINESS: MEG S.I.C. NO: MID006012405 FEDERAL EPA ID: ID: IL: ST: STATUS: BILLING: FACILITY ADDRESS: FOR MANIFEST

320 FARMER RD NORTH

<u>OTSEGO</u> MI 49078

GENERAL DESCRIPTION: WASTE GILS HYD GIL
PROCESS DESCRIPTION: FORKLIFT RPR
CENERATION AMOUNT: 1000 GALLONS PR

1000 GALLONS PER MONTH GENERATION AMOUNT: AMOUNT ON HAND: 1500 IN BULK

SHIPPING FREQUENCY: MONTHLY IN BULK

COLOR: BLACK PCT SOLIDS NOT SAMPLED:

VISCOSITY: AYERS OR PHASES: ONE PHYSICAL STATE: LIQUID LOW VOL% CODE MAX TYPICAL

TERIAL COMPOSITION: 0 80.00 100.00

10.00 20.00

ATTACHMENTS: NONE
RESTRICTED SUBSTANCES: NONE

EPA WASTE DESCRIPTION AND TREATMENT STANDARDS: RCRA HAZARDOUS WASTE: NO

IS THIS WASTE AN USED OIL? YES IS THIS WASTE EXEMPT? NO IS MATERIAL NOT A WASTE? NO

NOT RCRA WASTE SIGNATURE?

TYPE OF SAMPLE: GRAB # OF
TITLE: ENVIRO TECH P.O. NO: NAME: LEN E MYERS 4 TAKEN BY: CUSTOMER # OF DRUMS SAMPLED: 05/07/1992 (616) 692-6141

000161

COMMENTS: CHECK FOR SKOS

CORPORATE REVIEWS: DISPOSITION REVIEWER DATE TECHNICAL: ACCEPT CAC 05/21/92 POSSIBLE FACILITIES: PRICING CODE: F1

05/21/92

REGULATORY: ACCEPT MJK 05/21/92 654 JWH

APPROVED FACILITIES:

OPERATING:

(658) SAFETY-KLEEN CORP (654) SAFETY-KLEEN CORP

ACCEPT

633 EAST 138TH ST STATE HWY 146 NEW CASTLE KY 40050 DOLTON IL 60419

FED EPA#: ILD980613913 KYD053348108 STATE EPA#: 0310690006 502/845-2453

TELEPHONE: 708/849-4850 STATE CODE: 000161

**EPA WASTE CODES** 

APPROVD 0001038 DRUM OR BULK OOOO888 NOT FOR MANIFEST PROPER SHIPPING DESCRIPTION WAS BASED ON DOT-EPA RO WASTE PETROLEUM OIL

SURVEY INFORMATION RATHER THAN ANALYSIS. DESC. CLASS 3 UN1270 PG III (DO01)(ERG #27) SEE COMMENTS FOR DETAILS AND NOTICES.

COMMENTS: OK FOR FUEL. FRS PART 82101. DOO1 BASED ON SURVEY.

THIS SERVES AS NOTICE PER, 40CFR264.12(B), THAT THE FACILITY(IES) NOTED ABOVE HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.

D001

BRANCH, SUBMITTER C06101 WAYNE GADSON

COMPLETE REVISEL MEN01100

1 C C E P T FLUID RECOVERY SERVICES **\SHA** IE OILS HYD OIL

ACCEPT

CONTROL # 0138890-4 SURVEY # 259972

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR DARK BROWN WATER CONTENT 4 2 1

12 9 VT DESCRIPTION OIL MO FLASH AT 75 F BY SETAFLASH NON-VOLATILE PESIDILE FLAMMABE IT

FLAMMARI IT PH SCREF !

PH

7.0

EXTRACT BY METER 7 7

RADIOACTI IT NONE DETECTED

COMMENTS SMALL AMOUNT OF LIGHT GRAY SEDIMENT ON BOTTOM

FUEL EVALUATION OF TOTAL SAMPLE

18 100 BTU, LB ASH UPON COMBUSTION HEAT CONTENT 0 6 WT% TOTAL FLUOPI' 5 ( ) WT% TOTAL CHLORINE CL < 0 1 WT% TOTAL BROMINE BR 0 1 VT/ TOTAL SULFUR 0 5 WT%

COMMENT NO FLASH ON SETA AT 202/TOX TS 425 PPM CL

GENERAL COMPOSITION GENERAL COMPOSITION BY: SPECIFIC VISCOSITY CENTRIFUGE APPEARANCE TOTAL GRAVITY (CENTIPOISE) (VOL%) (VOL%) (WT %) AQUEOUS PHASE (FREE WATER) 0 0 2 0 0 0 ORGANIC THASE (FEEDSTOCK) 98 0 100 0 100 0 BOTTOM SLUDGE (SEMISOLIDS) 0 0 0 0 0 0 BOTTOM IN (SETTLED SOLIDS) 0 0 0 0 0.0 TOTAL 883 202 CPS 100 0 100 0 100 0

SPECIFIC COMPOSITION OF TOTAL SAMPLE COMPOSITION OF . TOTAL TOTAL SAMPLE SAMPLE (WT%) (WT%) WATER CONTENT 4 2 4 2 NON-VOLATILE PESIDUE DESCRIPTION OIL 92 9 92 9 VOLATILE OPGANICS BY DIFFERENCE 2 9 2 9 TOTAL 100.0 100.0

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS CS2-EXTRACT DETECTION METHODS FID FID

ORGANICS ORGANICS SAMPLE CODE CAS NUMBER COMPOUND NAME (WT%) (WT%) (WT%) TRACES OF VOLATILE ORGANICS DETECTED (<1 0" EACH) TR 0-27-1 100 0 100 O 2 9 TOTAL 100 0 100 0 2 9

SUMMARY OF VOLATILE ORGANIC COMPOSITION BY COMPOUND CHEMICAL CLASS WT%.

ALCOHOLS: AROMATIC HYDPOCARBONS ESTERS

GLYCOL ETHERS

KETONES

ALIPHATIC HYDROCARBONS CHLORINATED SOLVENTS ETHERS INHIBITORS

NITROGEN COMPOUNDS

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS) DETECTED 2 PPM AROCHLOR 1260

ADDITIONAL ANALYTICAL INFORMATION PCBS ARE 2 3 PPM

1 ABORATORY REVIEW R F/EL 1 SEG CODE RELEASED 05/20/92 LAB REVIEWERS KIT KLT ANALYZED 05/20/92 FIRS DETECTED AT 2 C PEM AROCHLOR 1260

TRACKING INFORMATION SURVEY RECEIVED SAMPLE RECEIVED

RESAMPLE RECEIVED

COMPOSITION OF:

DATE FACILITY 05/14/92 SK NEWCASTLE, KY 05/14/92

VOLATILE

TOTAL

RESAMPLE SHIPPED

VOLATILE

THE ANALYSES CONTAINED HEREIN APE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED ATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268 EPA WASTE CODES FOR LOR DOO1 ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC COMPOUND WASTE. TO JIRED MANIFEST FORM

EMERG RESP# 708-888-4660 24 HR

SK-DOT NUMBERS A: 0001038 B: 0000888

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED

#### SAFETY-KLEEN CORP.

### PREQUALIFICATION EVALUATION

MANIFESTING INFORMATION

REVISED :

MEN01101

CONTROL#: 0138890-4

1010 RECOVERY MENASHA

SAMPLE# : 259972

Safety-Kleen Corp provides to be accurate, but is known to t be consulted for complete inform by a Safety-Kleen representative	e incomplete. Fe ation. In addition	ederal and Sta n, certain vari	ite regulations and	the instructions on the	manifest form should	
'INFORM HAZARDOUS	ATOR US EPA NO	······································	DOCUMENT NO.	2. PAGE	UNDERLINED AREAS	
VASTE MANIFEST MI	D006012405				ARE REQUIRED	
3 GENERATOR NAME AND MAILING ADDRESS MENASHA				A. STATE MANIFEST DOCUMENT NUMBER		
320 FARMER RD NORTH						
OTSEGO MI 49078				8. STATE GENERATORS ID		
1 GENERATOR PHONE (616)	692-6141			9260056042		
T TRANSPORTER 1 C WEARY NAM	ME 6. US E	PA ID NUMBE	<del></del>	C. STATE TRANS ID		
SAFETY-KLEEN CORP	ļ			D. TRANSPORTER PHONE		
TRANSPORTER 2 COMPANY NAM	ME 3. US E	PA ID NUMBEI	R	E. STATE TRANS ID		
				F. TRANSPORTER PHO	ONE	
PACILITY NAME AND SITE ADDR	ESS 10. US	EPA ID NUMB	ER	G. FACILITY STATE ID		
SAFETY-KLEEN CORP 633 EAST 138TH ST	1	LD980813913		H. FACILITY PHONE		
DOLTON IL 60419						
•				708-849-4850		
11 US DOT DESCRIPTION (INCLUDI	NG ALL PARTS RE	EQUIRED BY U	S DOT)	CONTAINER	I. WASTE NO	
RQ WASTE PETROLEUM DIL CLASS 3 UN1270 PG III (DOD1)(ERG #27)				DRUM OR BULK	<u>D001</u> 000161	
PROPER SHIPPING DESCRIPTION WAS BASED ON SURVEY INFORMATION RATHER THAN ANALYSIS. SEE COMMENTS FOR DETAILS AND NOTICES.				NOT FOR MANIFEST		
.' ADDITIONAL DESCRIPTION FOR MATERIALS LISTED ABOVE				K. HANDLING CODES	FOR WASTES ABOVE	
				<u>\$01/\$02</u>	/150	
15. SPECIAL HANDLING INSTRUCTION	ONS AND ADDITIO	DNAL INFORMA	TION			
CONTROL NO 0138890-4 SAM				039 -FOR ALL SAFETY-	KIFFN CHIDMENTS	

#### HOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO-	SAFETY-KLEEN CORP EP.	A ID NO:	KYD053348108	<del></del>	
-	STATE HWY 146				
_	NEW CASTLE KY 40050				
Gene 268	er manifest number line numerator noted below is shipping to you a war. In accordance with 40 CFR 2687, the g	ste determined enerator hereb	ov provides notice that the	40 CRF Par he waste is	
	ricted and the EPA waste code and the appl	ropriate treatm	ent standards are as foll	ows:	
EPA	Waste Codes D001				
	F001-F005 Spent Solvents	TREAT Waste	MENT STANDARDS (mg/ water All Other	I) Check All	
	Regulated Hazardous Constituent	w/Sol		That Apply	<u>.</u>
	Acetone	0.0			-
	Benzene n-Butyl alcohol	0.0 5 0			
	Carbon disulfide	1.0	· -		
	Carbon retrachloride	0.0			
	Chlorobenzene	0.1			
	Crosnis fand crostyin anid)	2 A			
	' printer accounter	'' 1			
	1,2 Dichlorobenzene	0.6			
	Ethyl acetate  Sthyl benzene	0.0			
	Ethyl ether	0.0			-
	Isobutanol	5.0			
	Methanol	0 2	5 0.75		
	Methylene chloride	0.2	0.96		
	Methylene chloride(from Pharm Industry				
	Methyl ethyl ketone	0.0			
	Methyl isobutyl ketone	0.0			
	Nitrobenzene Pvridine	1.1			
	Fetrachioroethiyene	0.0			
	Igluene	1.1			
	1, 1, 1 Trichloroethane	1 0	5 0.41		
	1, 1, 2 - Trichloroethane	0.0	3 7.6		
	1, 1, 2 - Trichloro - 1, 2, 2 - trifluoro ethane	1.0			
•	Trichlarethylene	0.0			
	Trichlorofluoromethane Xylene	0.0			
	California List Prohibited Wastes	Level (n	ng/I) Treatment S	Standard	
	Halogenated Organic Compounds	1000.0			hese treatment standa
	Arsenic (As) Nonwastewaters	500.0	None		to not preclude solve
	Mercury (Hg) Nonwastewaters	20.0	None	r	ecovery prior to disp
	Nickel (Ni)	134.0			Subsequent disposal o
	Thailium (TI)	130.0			inrecovered waste is
	Chlorinated Biphenyls (PCB's)	50.0	•		subject to these stand
Desc	riptions and/or Treatment Subcategory		tandards Reference in 40 ogy Codes for 40 CFR		neck Ali nat Appiv
e Code	Description	Wastewaters			
:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) D			
	Low TOC Ignitable Liquids (<10 wt% TOC)		268.42(a) DE	ACT	
	High TOC Innitable Liquids (>10 wt% TOC)				S, or INCIN_X_
	Corrosives, all subcategories & CA list Arsenic (As)	268.42(a) D 268.43(a)	EACT 268.42(a) DE 268.41(a)	ACI —— 1/2	ariance until 5-8-92
	Barium (Ba)	268.43(a)	268 4 1(a)	v	aniance until 5-6-92
	Cadmium (Cd)	268.43(a)	268.41(a)		
	Chromium (Cr)	268.43(a)	268.41(a)		
	Lead (Pb)	268.43(a)	268.41(a)		
:	Low Mercury Subcategory (<260 ppm Hg)		268.41(a)		ariance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg		268.42(a) RM	ERC V	ariance until 5-8-92
	Selenium (Se)	268.43(a)	268.4 1(a)		
Codes	Sliver (Ag)  See attachment for supplemental list	268.43(a)	268.41(a)		
Ger	nerator Name: MENASHA		EPA ID: MIDOOBO1:	2405	
	nerator Representative Signature:				<del></del>
	me & Title of Representative	<del></del>		<del>,</del>	<del></del>
				400000	-
Sat	'ety-Kleen Sample Number 259972	Con	tro! Number: 0	130030	

# PREQUALIFICATION EVALUATION MANIFESTING INFORMATION

TEUID PECOVERY MENASHA

REVISED

MEN01103

CONTROL

SAMPLE# : 259972

|--|

Safety-Kleen Corp provides this manifesting information for instructional purposes only. All the information is believed to be accurate, but is known to be incomplete. Federal and State regulations and the instructions on the manifest form should be consulted for complete information. In addition, certain variations may be allowed by regulations, but need to be approved by a Safety-Kleen representative prior to shipment.

UNIFORM HAZARDOUS	1 GENERATOR L		DOCUMENT NO.	2. PAGE	UNDERLINED AREAS ARE REQUIRED	
? GENERATOR NAME AND MAILING ADDRESS MENASHA 320 FARMER RD NORTH			A. STATE MANIFEST	DOCUMENT NUMBER		
OTSEGO MI 49078			B. STATE GENERATORS ID			
# GENERATOR PHONE (616) 592-6141			926	9250058042		
5 TRANSPORTER 1 COM	5 TRANSPORTER 1 COMPANY NAME 6. US EFA ID NUMBER			C. STATE TRANS ID		
SAFETY-KLEEN CORP.				D. TRANSPORTER PHONE		
7 TRANSPORTER 2 COM	VPANY NAME	9. US EPA ID NUMBER		E. STATE TRANS ID		
				F. TRANSPORTER PHO	ONE	
FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP STATE HWY 148 NEW CASTLE KY 40050			10. US EPA ID NUMBER  KYD053348108		G. FACILITY STATE ID	
				H. FACILITY PHONE 502-845-2453		
11 US DOT DESCRIPTIO	N (INCLUDING ALI	PARTS REQUIRED	BY US DOT)	CONTAINER	I. WASTE NO	
RQ WASTE PETROLEUM DIL CLASS 3 UN1270 PG III (DOO1)(ERG #27)				DRUM OR BULK	<u>DO01</u> H	
PROPER SHIPPING DESCRIPTION WAS BASED ON SURVEY INFORMATION RATHER THAN ANALYSIS. SEE COMMENTS FOR DETAILS AND NOTICES.			NOT FOR MANIFEST			
ADDITIONAL DESCRIPTION FOR MATERIALS LISTED ABOVE			K. HANDLING CODES	FOR WASTES ABOVE		
				<u>\$01/\$02</u>	2/150	
				<u></u>		

15 SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

CONTROL NO 0138890-4 SAMPLE NO 259972 CUSTOMER NUMBER 5-061-01-4039 -FOR ALL SAFETY-KLEEN SHIPMENTS

EMERG RESP# 708-888-4660 24 HR

SK-DOT NUMBERS A: 0001038 B: 0000888

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED

80918 - R2271 (RUN 06/25/92) PROJECT: PREQUALIFICATION

PREQUALIFICATION EVALUATION - BRANCH INDUSTRIAL SERVICES GENERATOR SURVEY

COMPLETED: 06/25/92 REVISED: 06/25/92

.PAGE

BRANCH/SUBMITTER: 506101

ACCEPT

WASTE OIL HYDRAULIC

GRAND RAPIDS

MENASHA CORP

**FLUID RECOVERY SERVICES** safety-kieen,

MEN01104 A C

CONTROL #: 0000143141-2

LAB #: 0000012557-6 SURVEY #: 0000259978

CUSTOMER INFORMATION: 5061-01-4039

FEDERAL EPA ID: MIDO06012405

STATE EPA ID: 9260056042

STATUS: SQG

MANASHA CORP KEITH KLING N FARMER ST OTSEGO

MI 49078

ATTN: LEN E MYERS

BRANCH: 506101 - GRAND RAPIDS

GENERATOR: MENASHA CORP NATURE OF BUSINESS: MFG

S.I.C. NO: MQ: FEDERAL EPA ID:

ID:

FACILITY ADDRESS: FOR MANIFEST

320 N FARMER OTSEGO:

MI 49078 GENERAL DESCRIPTION: WASTE OIL HYDRAULIC
PROCESS DESCRIPTION: FORKLIFT REPAIR
GENERATION AMOUNT: 1000 GALLONS PER MONTH
AMOUNT ON HAND: 500 IN BULK

SHIPPING FREQUENCY: MTHLY IN BULK

COLOR: BROWN PCT SOLIDS NOT SAMPLED: 4-10 VISCOSITY · LAYERS OR PHASES: PHYSICAL STATE: LIQUID LOW TWO

ATERIAL COMPOSITION: CODE MAX TYPICAL 0 90.00 80.00 OIL, PETROLEUM ...

10.00 20.00 WATER ATTACHMENTS: NONE

RESTRICTED SUBSTANCES: NONE HAZARD CLASS: NUMBER: NEED ASSISTANCE

EPA WASTE DESCRIPTION AND TREATMENT STANDARDS: RCRA HAZARDOUS WASTE: NO

IS THIS WASTE AN USED OIL? YES IS THIS WASTE EXEMPT? NO P.O. NO: NAME: LEN E MYERS TYPE OF SAMPLE: TANK # OF DRUMS SAMPLED: O TAKEN BY SK REP

TITLE: ENVIR TECH 06/16/1992 (616) 692-6141

COMMENTS: CHECK FOR SKOS

CORPORATE REVIEWS: DISPOSITION REVIEWER DATE

06/25/92 MJK POSSIBLE FACILITIES: PRICING CODE: F1 TECHNICAL: ACCEPT

658 06/25/92 CAC 610 654 REGULATORY: ACCEPT OPERATING . ACCEPT JWH 06/25/92 000164

APPROVED FACILITIES:

(658) SAFETY-KLEEN CORP STATE HWY 146

NEW CASTLE KY 40050

FED EPA#: KYD053348108

STATE EPA#:

TELEPHONE: 502/845~2453

STATE CODE:

(654) SAFETY-KLEEN CORP 633 EAST 138TH ST DOLTON IL 60419 ILD980613913 0310690006

708/849-4850 000164

0000777 NOT FOR MANIFEST APPROVD 0001189 DRUM OR BULK

PROPER SHIPPING DESCRIPTION WAS BASED DOT-EPA WASTE OIL (MIDNR 021L) (NOT USDOT HAZARDOUS MATERIAL) ON THIS SINGLE ANALYSIS. GENERATOR MUST

(NOT USEPA HAZARDOUS WASTE) CERTIFY THAT SHIPMENT IS NOT HAZARDOUS. , •¹(•° COMMENTS: OK FOR SKOS USED DIL. 4

THIS SERVES AS NOTICE PER, 40CFR264.12(B), THAT THE FACILITY(IES) NOTED ABOVE HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.

**EPA WASTE CODES** 

021L

PREQUALIFICATION EVALUATION - BRANCH INDUSTRIAL SERVICES 80918 - R2271 (RUN 06/25/92)

PAGE MATERIAL ANALYSIS COMPLETED: 06/25/92 REVISED: 06/25/92

BRANCH/SUBMITTER: 508101 WAYNE GADSON

ACCEPT

ACC

· \*\*-

MEN01105

FLUID RECOVERY SERVICES NASHA CORP JTE OIL HYDRAULIC

CONTROL #: 0143141 \_ SURVEY #: 259978

GENERAL ANALYSIS OF TOTAL SAMPLE

DARK BROWN COLOR 27.2 WT% WATER CONTENT

NON-VOLATILE RESIDUE: 67.8 WT% DESCRIPTION: OIL : NO FLASH AT 75 F BY SETAFLASH FLAMMABILITY NO FLASH AT 142 F BY SETAFLASH FLAMMABILITY

DIRECT BY METER 6.4 PH

: NONE DETECTED RADIOACTIVITY

COMMENTS: AQ PHASE IS LIGHT YELLOW IN COLOR/EMS = YES

FUEL EVALUATION OF TOTAL SAMPLE

13200 BTU/LB ASH UPON COMBUSTION: < HEAT CONTENT: 0.1 WT% 0.1 WT% F : < TOTAL CHLORINE CL: TOTAL FLUORINE 0.2 WT% 0.1 WT% TOTAL BROMINE BR: < TOTAL SULFUR **S**: 0.3 WT%

COMMENTS: NO FLASH ON SETA AT 202/TOX IS 211 PPM CL

GENERAL COMPOSITION BY: GENERAL COMPOSITION: SPECIFIC VISCOSITY APPEARANCE TOTAL GRAVITY (CENTIPOISE) (VOL%) (WT %) AQUEOUS PHASE (FREE WATER)..... 26.0 26.0 ORGANIC PHASE (FEEDSTOCK)...... 74.0 74.0 BOTTOM SLUDGE (SEMISOLIDS)..... 0.0 0.0 BOTTOM SOLID (SETTLED SOLIDS)...... 0.0 0.0 .890 211 CPS TOTAL. 100.0 100.0

COMPOSITION OF: SPECIFIC COMPOSITION OF TOTAL SAMPLE TOTAL TOTAL SAMPLE SAMPLE (WT%) (WT%) WATER CONTENT..... 27.2 27.2 DESCRIPTION: OIL..... NON-VOLATILE RESIDUE 67.8 67.8 5.0 5.0 TOTAL 100.0 100.0

VOLATILE ORGANIC COMPOSITION OF ORGANIC PHASE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: CS2-EXTRACT : FID. FID

DETECTION METHODS

COMPOSITION OF: VOLATILE TOTAL ORGANICS **DRGANICS** SAMPLE CODE CAS NUMBER (WT%) COMPOUND NAME (WT%) (WT%) TRACES OF VOLATILE ORGANICS DETECTED (<1.0% EACH) TR 0-27-1 100.0 100.0 5.0 TOTAL 100.0 100.0 5.0

**ETHERS** 

ALIPHATIC HYDROCARBONS

CHLORINATED SOLVENTS

SUMMARY OF VOLATILE ORGANIC COMPOSITION BY COMPOUND CHEMICAL CLASS WT%:

.

ALCOHOLS AROMATIC HYDROCARBONS ESTERS

INHIBITORS GLYCOL ETHERS NITROGEN COMPOUNDS KETONES

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

ADDITIONAL ANALYTICAL INFORMATION: AQ PHASE IS TRACE VOLATILE ORGANICS

LABORATORY REVIEW: A SEG CODE: RELEASED: 06/24/92 LEVEL: 1

ANALYZED: 06/24/92 LAB REVIEWERS: KLT KLT

DATE FACILITY SURVEY RECEIVED : SAMPLE RECEIVED : 06/19/92 SK NEWCASTLE, KY 06/19/92

VOLATILE

RESAMPLE SHIPPED :

RESAMPLE RECEIVED:

TRACKING INFORMATION:

THE ANALYSES CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED TERIALS FOR ACCEPTANCE BY SAFETY-KLEEN IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

то	SAFETY-KLEEN CORP E	PA ID NO:	ILD980	613913		
_	633 EAST 138TH ST					
_	DOLTON IL 60419	-				
	r manifest number line no			11a, 11b, 11c,		
268.	In accordance with 40 CFR 2687, the licted and the EPA waste code and the ap	generator here	eby provide	s notice that the	waste	
	Waste Codes: DOO1	propriete treat	inent stands	81 G2 81 6 82 1C11C	443.	
ÇF A		TOEA	TAMERIT ST	ANDARDS (mg/l)		
	F001-F005 Spent Solvents	Wast	ewater	All Other	Check A	
	Regulated Hazardous Constituent Acetone			O.59	That App	oly
	Benzene	o ·		3.7		
	n-Butyl alcohol	5.		5.O		
	Carbon disulfide		05	4.81		
	Carbon tetrachloride	0.		0. <b>96</b> 0.05		
	Chlorobenzene Cresols (and crestyrc acid)	2.		0.05		
	C.clohexanone		125	0.75		
	1,2-Dichlorobenzene	0.		0.125		
	Ethyl acetate	0.		0.75		
	Ethyl benzene	0.		0.053		<b>1-</b>
	Ethyl ether	0. <sub>5</sub>		0.75 5.0		
	isobutanoi Methanoi	0.		0.75		
	Methylene chloride	Ö.		0.96		
	Methylene chloride(from Pharm, Indust	ry) 0.	44	0.96		
	Methyl ethyl ketone	0.		0.75		
	Methyl isobutyl ketone	0.		0.33		
	Nitrobenzene Pyridine	0.	12	0.125 0.33		
	Tetrachloroethlyene		079	0.05		
	Toluene		12	0.33		
	1, 1, 1 - Trichloroethane		05	0.41		
	1, 1, 2 - Trichloroethane	0.		7.6		
	1, 1,2 - Trichloro - 1,2,2 - trifluoro ethane			0.96		
	Trichlorethylene Trichlorofluoromethane	0.	062 05	0.091 0.96		
	Cylene	0.		0.15		
	California List Prohibited Wastes	Level	(mg/I)	Treatment St	andard	
	Halogenated Organic Compounds	1000.		Incineration		These treatment standar
	Arsenic (As) Nonwastewaters	500.		None		do not preclude solvent
	Mercury (Hg) Nonwastewaters Nickel (Ni)	20. 134		None None		recovery prior to dispo
	Thallium (TI)	130.		None		Subsequent disposal of unrecovered waste is
	Chlorinated Biphenyls (PCB's)	50.		incineration		subject to these standar
te Descr	uptions and/or Treatment Subcategory	Treatment	Standards R	deference in 40 s for 40 CFR 2	CFR	Check All
te Code	Description	Wastewate		Nonwastewater		inat Apply
1:	Wastewaters (<1.0 wt% TOC and TSS)		DEACT	NA	•	
	Low TOC Ignitable Liquids (<10 wt% TO			268.42(a) DEA	CT	
	High TOC Ignitable Liquids (>10 wt% TO					BS, or INCIN X
2	Corrosives, all subcategories & CA list	268.42(a)	DEACT	_ 268.42(a) DEA	CT	
4	Arsenic (As)	268.43(a) 268.43(a)		268.41(a) 268.41(a)		Variance until 5-8-92
5 6	Barium (Ba) Cadmium (Cd)	268.43(a)		268.41(a)		
7	Chromium (Cr)	268.43(a)		268.41(a)		
8	Lead (Pb)	268.43(a)	<del></del>	268.41(a)		
9:	Low Mercury Subcategory (<260 ppm H	g) 268.43(a)		268.41(a)		Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm	Hg) 268,43(a)		268.42(a) RME	RC	Variance until 5-8-92
0	Selenium (Se)	268.43(a)		268.41(a)		
1 r Cades	Silver (Ag) See attachment for supplemental list	268.43(a)	<del></del>	_ 268.41(a) -		
Ger	nerator Name: MENASHA		EPA	ID: MIDO06012	405	
	nerator Pepresentative Signature:					<del></del>
	ne & Title of Representative:					<del></del>
	et/-Kleen Sample Number: 259972				38890	<del></del>
341	ett meen Sample Number		CI INGINO	·· — • • • • • • • • • • • • • • • • • •		

# MENASHA DISPOSAL POLICIES

DOCUMENT #34

#### NATURAL RESOURCES COMMISSION

ARL T JOHNSON
M. LAITALA
DEAN PRIDGEON
HILARY F SNELL
HARRY H WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE



#### WILLIAM G. MILLIKEN, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, BOX 30028, LANSING, MICHIGAN 48909 HOWARD A. TANNER Director September 9, 1977

#### Dear Sir:

This letter and the attached guidelines contain the requirements for the disposal of PCB-containing capacitors and transformers. The basis for these requirements is set forth in Act 60 of 1976 and in the rules promulgated pursuant to Act 60.

Effective immediately, capacitors must be drained prior to disposal at a licensed landfill specifically approved for PCB disposal by the DNR. This policy applies to all capacitors bound for disposal regardless of whether the disposal site is in Michigan or in another State. Any person draining capacitors must have an approved Pollution Incident Prevention Plan (PIPP) which outlines in detail the specific draining procedures as well as methods of handling, storing, transporting and disposing of all associated PCB-contaminated materials. General guidelines for draining capacitors are attached.

The prior policy of disposing of PCB capacitors undrained in landfills was established based on information then available which indicated that only approximately 15 percent of PCB in capacitors could be removed by draining. A recent pilot study observed by this department has documented that approximately 50 percent of the PCB in capacitors can be removed by draining. Rule 17 (1) (b) of the Administrative Rules promulgated pursuant to Act 60 states that "prior to disposal of noncombustible PCB-contaminated materials in an approved landfill, all liquid PCB which can reasonably be drained from the solids shall be so drained and disposed of in conformity with these rules". It is reasonable, in our judgement, to drain capacitors if 50 percent of the PCB in them is recovered and subsequently destroyed.

PCB-containing transformers must be drained and rinsed with a suitable solvent prior to disposal of the transformer casing in a landfill approved specifically for PCB disposal by the DNR. Guidelines for draining of PCB containing transformers are also attached. Prior to the actual draining of any transformer bound for disposal a plan must be submitted



September 9, 1977 Page 2

to this office detailing the proposed method of draining the transformer and the methods for disposal of the resulting PCB-contaminated waste. This plan must also contain a description of the transformer and its location. The plan may be submitted on a case-by-case basis or as part of a Pollution Incident Prevention Plan covering all transformers owned by a facility. The names of commercial disposal facilities capable of draining capacitors and/or transformers will be supplied upon request.

If you have any questions regarding the above policies, please contact me at (517) 374-9640.

Very truly yours,

ENVIRONMENTAL SERVICES DIVISION

Richard Powers

Office of Toxic Materials Control

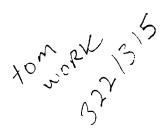
RP/no Enclosures

- 1. Only those facilities with an approved Pollution Incident Prevention Plan specifically covering the draining of capacitors may drain capacitors.
- 2. Two holes (approximately 1/2 inch in diameter) should be drilled through the capacitor casing for gravity draining. The draining hole should be positioned in the lowest point of the capacitor as it will be positioned for draining and the venting hole on the upper part of the capacitor.
- 3. The capacitor should be allowed to drain for at least one hour with the drain hole at the lowest point.
- 4. The drained capacitor casings must be placed in approved containers for hauling to the ultimate disposal site.
- 5. Drained liquid PCB must be handled, stored and transported according to the provision of Act 60 and the administrative rules promulgated pursuant to the Act.

#### Guidelines for Draining and Disposing of

#### PCB-Containing Transformers

- 1. Submit a plan to the Office of Toxic Materials Control prior to draining which covers all aspects of the draining-rinsing-disposal process. This plan must be approved before the process may begin. This plan may be submitted on a case by case basis or as part of a Pollution Incident Prevention Plan covering all transformers owned by a facility.
- 2. All free PCB must be drained from transformers.
- 3. Drained transformers must be rinsed three times with a suitable solvent.
- 4. Procedures to prevent the escape of any PCB-contaminated materials must be developed.
- 5. All PCB and PCB-contaminated materials must be handled, stored, transported and disposed of in accordance with the provisions of Act 60 and the Administrative Rules promulgated pursuant to Act 60.
- 6. The drained and rinsed transformer casing must be disposed of in a landfill specifically approved for PCB disposal by the DNR. A landfill approved for PCB disposal may be obtained by contacting the Resource Recovery Division at (517) 373-6620. Facilities in Wayne County should contact the Wayne County Health Department at (313) 274-2800 instead of the DNR.



STATE OF MICHIGAN

RATING - CC RICK RETAINS

TATURAL RESOURCES COMMISSION

CARL T JOHNSON E M LAITALA DEAN PRIOGEON HILARY F. SNELL HARRY H. WHITELEY JOAN L. WOLFE CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING, BOX 30028, LANSING, MICHIGAN 48909 HOWARD A. TANNER, Director

MEN01111

#### CERTIFIED MAIL

030014

MENASHA CUMP PAPENBUARD DIV 320 FARMER ST OTSEGO

#1 49078

You should have recently received a letter from the U.S. Environmental Protection Agency (EPA) explaining the Toxic Substances Control Act (Public Law 94-469 of 1976) Section 6(e) PCB regulations published in the February 17, 1978, Federal Register (40 CFR Part 761). This letter is to:

- 1. Explain how the Federal and State PCB regulations interface;
- 2. Advise you of certain policy changes in the enforcement of Michigan Act 60 PCB regulations;
- 3. Alert you to a new cooperative enforcement agreement being developed between the U.S. EPA and the Michigan Department of Natural Resources (DNR) for joint enforcement of Federal and State PCB regulations and;
- 4. Inform you of the procedures for filing your 1978 PCB Annual Report required by Act 60.

The new Federal PCB regulations have essentially the same requirements as the Michigan Act 60 regulations. However, there are some technical details in the two sets of regulations which are in conflict. To prevent duplication of effort by Michigan businesses which were in compliance with Act 60 prior to the promulgation of the Federal regulations, the U.S. EPA and the Michigan DNR have negotiated an agreement which will govern the enforcement of the Federal PCB regulations in Michigan.

The Disposal requirements of the two sets of regulations are compatible. PCB and PCB-contaminated wastes must be disposed of in accordance with the Federal regulations. Where the Michigan regulations are more stringent or cover areas not covered by the Federal regulations, both sets of regulations must be complied with. In general, it would be best to contact this office prior to disposal of PCB wastes if you have any questions concerning proper disposal methods or sites.



The Federal and State PCB labeling regulations have several minor areas of conflict. The EPA-DNR agreement provides for the following resolutions of these conflicts:

- 1. All PCB items currently marked with labels as set forth in Rule 10 (R 299.3310) promulgated pursuant to Michigan Act 60 can continue to be labeled with this mark.
- 2. All unmarked items (as defined by the Federal Register) and items marked in another fashion are to be marked with the Federal Mark as per the schedule outlined by Section 761.20 of EPA's Disposal and Marking Regulations (Feb. 17, 1978 Federal Register).
- 3. All PCB items that are intended for transport out of the State of Michigan or are transported out of the State of Michigan must be labeled with the Federal Mark.
- 4. All PCB transformers that are currently marked with the Michigan label must be re-marked with the Federal Mark when these units are serviced.
- 5. All high voltage capacitors that are currently marked with the Michigan label must be re-marked with the Federal Mark when these units are serviced or inspected.

If these conditions are met, the U.S. EPA will not initiate prosecutorial or enforcement action against the regulated parties for a period of 5 years. Federal PCB labels are available from the companies listed on the attached sheet.

The new Federal PCB Regulations and a change in the American National Standards Institute C-107 "Guidelines for Handling and Disposal of Capacitor and Transformer Grade Askarels containing Polychlorinated Biphenyl" have necessitated certain policy changes in the enforcement of Michgan Act 60. Effective immediately, the following policy changes will take effect:

- 1. Michigan will accept the Federal PCB Mark in all cases where the Michigan label is required by Act 60, since the Federal Mark contains essentially the same information as the Michigan label.
- 2. Capacitors will be disposed of pursuant to the U.S. EPA regulations. This means that capacitors need not be drained prior to disposal.
- 3. The reference to ANSI C-107 Guidelines in the Michigan PCB Label pursuant to Rule 10 (R 299.3310) of the rules promulgated pursuant to Michigan Act 60 is no longer valid nor applicable. The ANSI C-107 Committee has recommended that the C-107.1-1974 Guidelines be withdrawn because they are incompatible with the Federal PCB regulations. Therefore, all disposal of PCB and PCB wastes must be in accordance with the applicable Federal and State regulations only.

The U.S. EPA and the State of Michigan are currently developing a cooperative enforcement agreement which would enable the Michigan DNR and the U.S. EPA to develop cooperative compliance monitioring and enforcement programs to assure compliance with all applicable State and Federal regulations for the marking and disposal of PCB within Michigan. We expect this agreement to be fully developed and implemented shortly. The main thrust of the PCB compliance and enforcement programs will be review of PCB Pollution Incident Prevention Plans and in-plant inspections for compliance with Federal and State PCB regulations. We expect all Michigan businesses to be in strict compliance with all applicable State and Federal PCB regulations as of the date of this letter. Failure to comply with these regulations may result in the imposition of penalties or in the prosecution of your Company for violation.

There will be no PCB Act 60 Annual Reporting Booklets mailed this year. The information required in the Annual Report by Act 60 is the same for each year. The "PCB Waste Disposal Manifests" filed for 1978 will be assumed to cover all disposal made in 1978. It will also be assumed that your 1978 use of PCB was the same as that reported in your 1977 Annual Report. If you did not file a 1977 PCB Act 60 Annual Report or your PCB situation has changed from the 1977 report, please complete the attached "1978 PCB Annual Report Form Request", return it to the indicated address and the necessary forms will be mailed to you. Hopefully this procedure will avoid duplication of existing records and save both affected businesses and the State considerable money and staff time while still effectively controling PCB.

If you have any questions concerning this letter or other areas of the PCB regulations, please feel free to contact me at (517) 374-9640.

Very truly yours,

ENVIRONMENTAL SERVICES DIVISION

Kichard Fore &

Richard Powers
Office of Toxic Materials Control

RP:tkr

cc: John Sykes, EPA Enf. Washington
Karl Bremer, EPA Region V, Office of Toxic Substances
J. Hesse
Files

Deso Newco Chamicas Wastery, 4526 Royal Olve 716 2856944 Niagaia Fall N.Y.

#### COMPANIES PRINTING PCB LABELS

- 1. Stoneware P. O. Box 546 Arbada, CO 80001
- 2. Labelmaster 6001 N. Clark Street Chicago, IL

(312) 973-5100

- 3. Twin City Sign and Decal Company P. O. Box 8 Champagne, IL 61820
- 4. Energy Systems Company P. O. Box 1975 El Dorado, AK 71730 (501) 863-7173

#### PCB ACT 60 ANNUAL REPORT REQUEST FORM

This fo during	rm need be returned only if your use and/or sale for use of PCB 1978 has changed from that reported on your 1977 PCB Annual Report
FROM:	FACILITY NUMBER (Please print your company name, address, and facility number as
Company	Name it appears on your mailing label.
Address	
Address	·
City	State Zip
DIRECTIO	ONS: Check the appropriate boxes below which apply to your changed PCB situation since your 1977 Annual Report. Fold this page as indicated on the back, staple once, apply postage, write in return address and mail. The 1978 PCB Annual Report forms necessary to report your changes will be sent to you. Please complete these 1978 Annual Report forms and return them prior to January 1, 1979. If you have any questions regarding these forms, please contact Richard Powers of the Office of Toxic Materials Control in Lansing (517) 374-9640.
1.	The 1978 use at this facility of PCB-containing capacitors, transformers and/or any other PCB-Products (other than small capacitors and transformers) has changed from that reported for 1977. Please send "FORM PCB-120. Annual Report of Use of PCB-Containing Capacitors, Transformers or other PCB-Products."
2.	The 1978 Manufacture or Sale for Use at this facility of PCB-containing capacitors, transformers, and/or any other PCB-containing products (including small capacitors and transformers) has changed from that reported for 1977. Please send "FORM PCB-130. Annual Report of Manufacture for Sale and/or Sale of PCB-Containing Capacitors, Transformers, and/or Other PCB-Products."
3.	This facility has not submitted a Pollution Incident Prevention Plan (or an addendum to an existing plan) covering PCB. Please mail information on developing this plan.
4.	. Please mail the following number of PCB Disposal Manifests. Manifests.

FOLD HERE SECOND	
	<del></del>
	PLACE
	FIRST CLASS STAMP
	HERE

MICHIGAN DEPARTMENT OF NATURAL RESOURCES ACT 60 REPORTS P. O. Box 30032 LANSING, MICHIGAN 48909

FOLD HERE FIRST

MEN01

lazardous Waste File

DATE: 21 October 1980

Notes on phone conversation with EPA headquarters regional V, in Chicago.

FROM: John Blauwkmap

SIB

On Friday, October 19, 1980, I talked with an engineer in the hazardous waste section of EPA Headquarters Region V in Chicago. Three main topics of discussion were:

- 1. The F- series waste,
- 2. The use of spent liquor,
- Used lubricating oil.

The main concern was the F-series waste was whether or not the waste was considered hazardous if contained minute quantities of one or more of the F-series waste. The engineer stated that just because the waste contained a minute quantity of one or more of the F-series chemicals was it not automatically hazardous. The waste would be hazardous only if it met one of the four criteria for hazardous waste. If a waste contain some of the F-series chemicals, he suggests it be evaluated to determine if it is a hazardous waste.

I explained to him how we were handling the spent liquor. It was his a option that the spent liquor would not be subject to hazardous waste reporting and regulations because it would be exempted under the beneficial reuse exclusion in the law. He however, was not sure that this exclusion would apply if the spent liquor were used as road binder rather than being incinerated.

The subject of used lubricating oil is still a gray area and they are waiting further interpretative memoranda to further define this area. If the oil is collected and disposed of it is subject to hazardous waste regulations. However, if we take the oil and burn it in the boilers, it may not be subject to regulation under the beneficial reuse exclusion.

Another subject of discussion was whether or not we should be licensed as a hazardous waste treatment and storage facility. Basically if we do anything with hazardous waste to render it nonhazardous we must be licensed as a treatment facility. For example, if we take acid used to clean the boilers and pump it out to the ash lime pond where it is nutrialized, we are treating hazardous waste and must be licensed under the new regulations. We may also require a license to burn used oil or even to dilute spent liquor to get it under the pH of 12 so that it can be used as road binder.

or the a second solder to the accelerate

- Ec Manoers

It appears to me at this time the only hazardous waste we may have to dispose of would be old PCB containing transfermers and capacitors and possibly used lubricating oil. Even if this turns out to be true, we will most likely need to be licensed as a hazardous waste treatment and storage facility, so that we can continue our present operations with used lubricating oil, waste acids and possibly diluting spent liquor to use as road binder.

cc: B. Buchanan

JB/kj

TO:

Jim Porter

SUBJECT: White Water Spill

DATE: April 29, 1987

FROM: Keith Kling B

On 4/29/87, I found that white water was again running out the door of the compactor area at secondary fiber. There was a large puddle on the asphalt with a slight amount running onto the ground. I called the pulp mill tour boss, Ken Simons, who called in a man to clean up the problem area.

I discussed the cleaning routine with the driver from Michigan Disposal. He stated that cleaning around the compactors is minimal to non-existent.

As we discussed in March, allowing white water to run onto the ground could result in a very expensive future clean up. It also works against the present good relationship Menasha has with the Michigan Department of Natural Resources.

I realize that you have set up a procedure for routine cleaning in this area. The people responsible for initiating the cleaning do not appear to understand the importance of this procedure. It is important that the people involved realize that spills to the ground are no longer acceptable.

cc: John Bonham
Bruce Buchanan
John Blauwkamp
Sandra Jones

/kj

4/30/87

PARAMINI FOREMENT —

THIS 15 THE ACCORD TIME IN A little OVER

A MONTH That A Sall has resulted due to

OUR IN Attention to the cleanliness of the

Secondary Fisher Rejeits Building. Kerth's Attanted

letter of the over ABOVE FORM tout the

ENVIRONMENTAL CONCERN. IT 15 ABSOLUTELY NECESSARY

THAT WE STOP THIS From HAPPENING. I AM OPEN TO

YOUR Susgistions. In the Mean time Havenfure

OPERATOR SECONDARY SHEEK TWIE FER SHIFT of

EACH OF YOUR SHOULD FRIT IN YOUR SHIFT BEY THAT THE

SAME PRIME 15 PRIMENES of WATER 15 NOT ECATIVO.

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memo CORF MEN01120

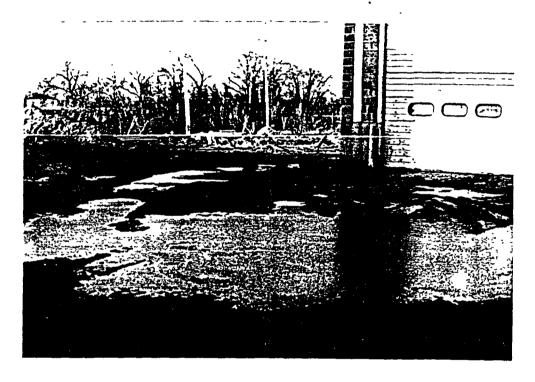
T): Jim Porter

DATE: March 16, 1987

SUBJECT: Environmental Problem

FROM: Keith Kling

The area outside the mill at the secondary fiber compactors has the potential of becoming an environmental problem. As the attached picture shows, white water, stock and plastic have been running out the doors onto the ground. This has occurred several times in recent months.



I have discussed this situation with the driver from Michigan Disposal. He said that each compactor is moved out to be emptied about twice each week, and is gone about two hours. He has agreed to notify the hydrapulper operator each time he removes a compactor. This will allow at least two hours in which to clean up the plastic which plugs up the grating at the sump pump.

The present clean-up procedure, when being done, is to wash the plastic into the sump pit. This has caused the pump to plug on at least two occasions. It is likely that a clean-up procedure involving shoveling excess plastic to a dumpster will be needed to prevent future spills to the ground.

Any help you can provide now to keep us from a future environmental clean-up would be appreciated.



May 9, 1988

Shelley E. Padnos Louis Padnos Iron & Metal Company P.O. Box 1979 Holland, MI 49422

Dear Shelly:

On 5/2/88 I discussed with you Menashas' policy on the disposal of our empty containers. Our policy is that all empty containers are to be disposed of in a dumpster designated to go to a class II landfill. On several occasions your drivers have found empty containers in with the scrap metal picked up by your facility. I have distributed a letter to all our company employees stating our policy. (attached) In the event that containers are still found in your dumpsters, please contact me before loading it onto your truck. I will contact the department head for that area to get the inappropriate items removed.

If you have further questions, please call me at 692-6141, Ext. 408.

Sincerely,

OTSEGO PAPERBOARD DIVISION

Keith B. Kling

Environmental Supervisor

Keeta B. Kling

cc/ John Bonham Ken Hartman Jeff Burleigh

/kls
padnosltr.88



TO:

All Mill Personnel

DATE: May 4, 1988

SUBJECT: Trash Disposal

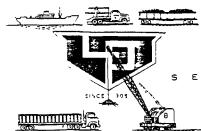
FROM: Keith Kling

Disposal of trash from our mill is becoming an increasingly sophisticated process. It is no longer acceptable to throw trash into the closest wastebasket or dumpster. All empty containers are considered to possibly contain small amounts of hazardous waste. Paint cans, spray cans, buckets, plastic containers, etc. must go to the compactor at #1 machine dock. Empty metal chemical drums are to be washed and put into the storage area by the coal piles.

Louis Padnos, our scrap metal recycler, now has a policy of not picking up any dumpsters in which empty containers are found. Our other disposal and recycling facilities have or are presently developing similar policies.

The waste disposal bins around the mill are labeled as to what can be put in them. If questions come up about where to dispose of a particular item, please contact someone from the technical department for directions. Everyones' cooperation will be needed to insure Menasha is able to receive continued use of area disposal facilities.

/kls tshdis.88



#### **LOUIS PADNOS IRON & METAL COMPANY**

CONDARY METALS AND FIBRES

P O BOX 1979, HOLLAND MICHIGAN 49422-1979, U S A PHONE 616 396-6521 TWX 810 292-6167 FAX 616 396-7789

April 27, 1988

Menasha Corporation 320 North Farmer Otsego, MI 49078

Dear Mr. Jeff Burleigh:

Our records indicate that we are presently receiving scrap drums or other containers from your facility. In order for us to be able to continue to handle this material we will be requiring that you provide us with a letter, along the lines outlined in the attached proposed letter, stating that all drums, barrels, paint cans, etc., which we receive from your facility contain no hazardous substances. Effective as of June 1, 1988, if we do not have such a letter on file from your firm, we will have no alternative but to refuse to accept any scrap containers generated by your firm. Your cooperation and assistance in forwarding such a letter to my attention prior to June 1, 1988, will be greatly appreciated. If you have any questions with regard to this matter, please phone me.

Very truly yours,

LOUIS PADIOS IRON & METAL COMPANY

Shedley E. Padnos

SEP/skb

Enclosure

Discussed of shelley @ 5 out 11 5/2/88. Many of our Shipments have included various types of emiainers. I told her I would send a letter stating our policys and that if they find these things in their containers they should contact me and not near away the dumpster.

# PROPOSED LETTER TO BE SENT BY YOUR FIRM TO LOUIS PADNOS IRON & METAL

Date

Ms. Shelley E. Padnos Louis Padnos Iron & Metal Company P.O. Box 1979 Holland, MI 49422-1979

Dear Shelley,

We hereby certify that any and all drums or other containers of any type, delivered to any of your yards or picked up by L.P. Transport, Ltd. from our facility, have been thoroughly cleaned and are free from any and all hazardous substances, in accordance with all applicable State and Federal laws and regulations. We further certify that all such containers have had the tops, as well as any plastic liners, completely removed from them prior to our disposal of them.

We understand that by certifying such containers as "clean" we are agreeing that each container has been properly treated, using one of the following two methods:

1. The container interior and exterior have been cleaned, using an effective cleaning agent, and purged of all foreign matter and prior residues, including labels and decorative coatings, AND in the case of a container containing any acutely hazardous waste, as defined by Federal Regulations, the container has been triple rinsed with an appropriate solvent:

or,

2. The container interior and exterior have been thermally neutralized in a drum reclamation furnace, thereby removing all foreign matter and prior residues, including labels and decorative coatings AND in the case of a container containing any acutely hazardous material, as defined by Federal Regulations, the drum has been triple rinsed with an appropriate solvent.

Date

Notwithstanding any other warranty or limitation of warranty herein, we warrant that to the best of our knowledge, based upon reasonable inquiry, the metal scrap to be delivered under this agreement does not contain any "hazardous substance" as that term is defined in Sec. 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601(14), as amended, except those "hazardous substances" which are integral constituents of the metallic fraction of the scrap metal. We agree that we will indemnify and hold Padnos harmless from any and all claims, demands and liabilities, including reasonable attorney's fees, to the extent resulting in whole or in part from a breach of the foregoing warranty.

Very truly yours,

(Your Firm's Name)

(Your Signature)



TO:

John Bonham

DATE: May 30, 1990

SUBJECT: Shipping of Hazardous Waste

FROM: Keith Kling

A situation recently occurred where hazardous waste was removed from our mill and the MDNR was not properly notified. In this case, the material removed was waste naphtha from our rented parts cleaners. The following is the policy for removal and shipment of hazardous waste.

- Federal and State regulations require generators and transporters of hazardous waste treatment and disposal facilities to use form 8700-22 (Uniform Hazardous Waste Manifest) for both inter and intrastate transportation.
- Form 8700-22 requires specific information about the facility including the U.S. EPA twelve digit identification number, name and mailing address, 24 hour emergency telephone number, name of all transporters who will transport the waste and the final planned destination of the waste.
- A completed description and quantity of the waste must be entered onto the manifest.
- A handwritten signature and date certifying that the information is correct must be included.
- The top (white) copy must be removed and sent to the MDNR by the 10th of the month following the removal.
- The bottom (goldenrod) copy must be filed at our mill and must be retained for three years.

There are many other rules which must be followed such as type of shipping containers, shipments out of State, shipments across international borders, and types of labels required. In all cases where hazardous wastes are to be shipped, please notify Len Myers or Keith Kling to review and sign the manifests.

cc: Jim Porter John Bonham
Jeff Burleigh Paul Jachim
Jerry Mayrand Dave Merkel
Gary Roys Len Myers

Ken Vosters Jack Nichols Kim Huyge Sheryl Austin

John Blauwkamp

KBK:amc



To: SAFETY-KLEEN FLUID RECOVERY CUSTOMERS

Subject: WASTE DRUM PREPARATION AND PICK-UP

In order that hazardous waste is handled properly and in compliance with the current DOT and EPA regulations, the following checklist will be used when inspecting containers prior to transporation:

- 1. General appearance must be good. Old labels and stencils must be removed or obliterated.
- 2. The sides and tops must be free of all waste and residue.
- 3. No leaking drums.
- 4. Open head drums must have a 5/8 inch bolted ring with bolt located below ring.
- 5. Open head drums must have gaskets for covers (no plastic in lieu of gaskets).
- 6. No drums with bulged tops or bottoms.
- 7. Drums must not have any large dents or creases.
- 8. Drums must have all steel bungs secure, not stripped or cross threaded.
- Hazardous waste labels must be completed, legible and not faded. Stenciling of all required information is acceptable. Place labels on top one-third side of drum (not in the middle and not on top).
- 10. The DOT hazard class label must be used if applicable per the manifest. (FLAMMABLE, CORROSIVE, ETC.) label must be adjacent to hazardous waste markings.
- 11. The manifest quantity must agree with the quantity picked up.
- 12. Pre-ship number must be on drum. (CONTROL NUMBER)
- 13. Will accept DOT 17C, 17E, 17H steel drums and original material drums. Plastic and fiber drums are accepted only in over-pack drums and only for incineration.
- 14. No drums wrapped in plastic or plastic hanging from cover.

We offer DOT approved open headed drums, over-pack drums, drum lids, lock rings, and drum gaskets for sale. For prices or information on any of these items, please contact your local sales representative.

As part of our service, we will continue to supply our customers with hazardous waste labels, DOT labels if required, and the proper hazardous waste manifest.

By assisting us in preparing your drums for pick-up, you can be sure your pick-up will be completed quickly and without problems.

We value your business and look forward to servicing your needs in the future. If you have any questions about our Fluid Recovery Service, please contact us. Thank you for your cooperation.



May 23, 1990

Michigan Department of Natural Resources P.O. Box 30038 Lansing, MI. 48909

A recent study of our files revealed that several of our Uniform Hazardous Waste Manifests were misfiled, therefore the MDNR copy was never mailed out. All of the copies related to waste naphtha removed from the parts cleaner we rent from Safety-Kleen Corporation. I have enclosed the MDNR copy for the services performed from November, 1989 to the present.

If you have any questions concerning this matter feel free to call me at (616) 692-6141.

Sincerely,

Otsego Paperboard Division

Keith B. Kling

Environmental Supervisor

Enclosure

cc: John Bonham

John Blauwkamp Ken Vosters

KBK:amc

#### SURGE PIT HIGH LEVEL ALARM PROCEDURE

The surge pit level is controlled by two (effluent) pumps that pump to the aeration pond. The surge pit has two sources of make-up; from the impco clear well and overflow from the big white water chest.

For normal operation, when both pumps are in automatic, the primary pump (north location) is energized when the level rises to 65% and deenergizes when the level is lowered to 22%.

If the level should rise above 80%, the secondary pump (south location) is energized. The secondary pump deenergizes at 70%.

The high level alarm is energized at 90%.

When the high level alarm is energized the following procedure must be followed:

- 1) Check to insure that both pumps are running.
- 2) If both pumps are running, check the flow recorder to verify adequate flow to the aeration pond. With the primary pump running, flow should be about 1200-1500 gpm. With both pumps running, flow should be about 1500-1800 gpm. If there is low flow, notify the foreman that the effluent pumps are plugged and surge pit overflow is imminent.
- 3) If only one pump is running, switch the other pump to manual and push the "green" start button. It the pump fails to start, immediately report to the foreman that there is a problem with either the primary or secondary pump, whichever pump has failed to start.

After the level has returned to the normal operating range, determine why the pump failed to start automatically ie, pump was not in automatic, electrical overload due to plugged pump.

4) At the foreman's discretion, he may shut down the u-drain sump pumps which will result in filling the refiner room basement with white water or shut-down the no. 1 PM basement sumps which will result in filling the no. 1 PM basement with white water.

No damage can be done by shutting down the u-drain sumps. Any high level will overflow into the secondary fiber

basement.

Shutting down the no. 1 PM basement sumps  $\underline{can}$  result in damage. This step is a last resort if there is danger in white water flowing to the River.

Failure to immediately respond to the high level alarm may result in shutting down no. 1 PM and white water spilling into the Kalamazoo River. Spillage into the Kalamazoo River would be a violation of the Company's NPDES permit, possibly resulting in a fine or a lawsuit.

Memo

To:

All Mill Employees

From:

Keith Kling

Date:

October 8, 1991

Subject:

Disposal of Solvent Wastes

The question of what must be done with paint and other solvent wastes comes up following each mill down or clean up. Please use the following guidelines for disposal of these wastes.

- Never put liquids of any kind into dumpsters going to a landfill. This includes the compactors.
- Dried out or empty paint cans can be disposed of in the compactor at the East end of #1 machine. The lids should be left off so the people at the landfill can see that they are empty.
- Solvent wastes such as paint thinner, stripper, brush cleaner, grease remover, etc. must be taken to the storeroom. The attendants will put this material into a specially labeled drum for future disposal.
- Partially full cans of paint may be disposed of in the solvent barrel at the storeroom. If there are nearly full cans, or if there are many partial cans, they should be placed next to the solvent drum and they will be disposed of separately.
- Used oil should never be put in with solvent wastes. Each full solvent drum must be tested prior to disposal and total disposal cost is several hundred dollars. The oilers and the vehicle maintenance people provide storage for used oil.

In the event that questions arise on disposal of any product, please contact Keith Kling or Len Myers before throwing it out.

KuthK

Memo

## MEN01132 PAPERBOARD DIVISION

MENASHA CORPORATION

TO:

All Mill Employees

FROM:

Keith Kling KBK

DATE:

May 10, 1994

SUBJECT:

Waste Disposal

While our mill buildings and equipment have been improved and their appearance upgraded, one area of our business has been going downhill. In recent months, piles of trash, cement, and garbage mysteriously appear in any open space. This is both unacceptable and illegal. Systems have been set up to handle the mill's trash and they must be followed. Engineered projects include money for disposal of waste. In smaller projects not requiring engineering, trash disposal must be supervised by the person initiating the work. Outside contractors are the responsibility of the person hiring them.

In order to maintain good service from our waste handling firm we are upgrading the waste treatment area to provide room for dumpsters. The Environmental Group can assist anyone with questions about where to dispose of unwanted material. This mill spends over \$600,000 a year to handle waste disposal and our facility should reflect that level of commitment when people see it.

An additional problem we are experiencing has been routine traffic into the old landfill area, north of our compost facility. Trucks and other equipment have broken down the north drive causing it to wash out in areas. There is also tire tracks on the cap of the landfill itself. Gates are being installed to stop all unauthorized traffic in this area. Menasha will aggressively pursue and collect for damages anyone found to be driving vehicles in this area.

Each employees help is needed if our property is to look like the first class mill we all are working to have.

KBK/jla

Cren Hanager Maintenance Manager Engineer

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